

BEFORE THE COMMONWEALTH OF KENTUCKY

PUBLIC SERVICE COMMISSION

SUPPLEMENTAL REBUTTAL TESTIMONY OF

SHARON E. NORRIS

ON BEHALF OF

**AT&T COMMUNICATIONS OF THE SOUTH CENTRAL
STATES, INC.**

AND TCG OHIO, INC.

CASE NO. 2001-105

AUGUST 27, 2001

1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 **A.** My name is Sharon E. Norris and my business address is P.O. Box 658,
3 Loganville, Georgia 30052. I am a consultant with SEN Consulting, Inc. I
4 previously filed testimony in this docket on July 9, 2001 on behalf of AT&T
5 Communications of the South Central States, Inc. ("AT&T"). I now submit this
6 supplemental rebuttal testimony on behalf of AT&T.

7 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

8 **A.** My testimony responds to BellSouth's performance measures data and data
9 reporting for the months of April, May, and June.¹ First I explain to this
10 Commission the significant data reporting and performance problems BellSouth
11 has experienced in Georgia. Then I discuss AT&T's concerns regarding the
12 integrity and reliability of BellSouth's performance reporting and its associated
13 underlying data in Kentucky. As explained in greater detail below, the Georgia
14 problems are important to this Commission's review of BellSouth's compliance
15 with Section 271 of the Telecommunications Act of 1996 (the "Act") because
16 deficiencies in Georgia likely indicate similar deficiencies in Kentucky.

¹ My testimony should be read in context with the testimony of WorldCom witness Karen Kinard and AT&T witness Cheryl Bursh filed in this docket on July 9, 2001. Ms. Kinard explains why the Interim SQM BellSouth seeks to rely on in Kentucky is inadequate. Ms. Bursh explains why BellSouth's proposed interim SQM does not accurately report the measures ordered by the Georgia Commission.

1 **Q. WHAT IS YOUR UNDERSTANDING OF BELL SOUTH'S OBLIGATIONS**
2 **UNDER SECTION 271 OF THE TELECOMMUNICATIONS ACT OF**
3 **1996?**

4 **A.** As stated in my July 9, 2001 testimony, BellSouth has the burden of establishing
5 that each and every requirement of Section 271 including the obligation to
6 provide nondiscriminatory access to its services and facilities, has been satisfied.²
7 One of the things BellSouth relies on in its attempt to satisfy this burden is self-
8 reported performance data provided to this Commission in BellSouth's Service
9 Quality Measurement ("SQM") reports. (See Direct Testimony of Alphonso J.
10 Varner in Case No. 2001-105 ("Varner Dir. ") (May 18, 2001) at 4.) Before this
11 Commission can rely on that self-reported data to determine checklist compliance,
12 however, BellSouth must provide "reasonable assurance that the reported data is
13 accurate."³

² See, e.g., Memorandum and Order, *In the Matter of Application of Ameritech Michigan Pursuant to Section 271 of the Communications Act of 1934, As Amended, to Provide In-Region, InterLATA Services in Michigan*, 12 FCC Rcd. 20,543 (F.C.C. August 19, 1997) (No. CC 97-137, FCC 97-298) ("Ameritech Michigan Order") ¶ 43 ("the ultimate burden of proof with respect to factual issues remains at all times with the BOC"), ¶ 158 (BOC "has the burden of demonstrating that it has met all of the requirements of Section 271," including that "it provides nondiscriminatory access to all OSS functions"); Memorandum Opinion and Order, *Application by BellSouth Corp., et al. For Provision of In-Region, InterLATA Services in South Carolina*, 13 FCC Rcd. 539 (F.C.C. Dec. 24, 1997) (No. CC 97-208, FCC 97-418) ¶ 37 ("the BOC applicant retains at all times the ultimate burden of proof that its application is sufficient") (footnote omitted).

³ Memorandum and Order, *In the Matter of Application By Bell Atlantic New York for Authorization under Section 271 of the Communication Act to Provide In-Region, InterLATA Service in the State of New York*, 15 FCC Rcd. 3953 (F.C.C. Dec. 22, 1999) (No. CC 99-295, FCC 99-404) ("Bell Atlantic New York Order") ¶ 433. This requirement, stated in the context of public interest review of a performance monitoring plan, applies at least equally to BellSouth's proffer of its own data to prove checklist compliance.

1 **Q. CAN BELLSOUTH ESTABLISH THAT ITS REPORTED DATA IS**
2 **ACCURATE?**

3 **A.** No. As I previously testified, BellSouth cannot establish the accuracy of its
4 reported data. Indeed, BellSouth's May and June performance reports
5 demonstrate that BellSouth's systems for measuring and reporting data remain
6 unsuitable to support local competition. BellSouth:

- 7 • continues to have problems with the accuracy of its data;
- 8 • has not yet developed the ability to report accurately on the metrics in
9 its "Interim" SQM;
- 10 • continues to provide performance reports that are missing key data;
11 and
- 12 • inappropriately excludes data from its performance measures reports.

13 **Q. DO BELLSOUTH'S PERFORMANCE REPORTS DEMONSTRATE**
14 **BELLSOUTH'S SYSTEMS ARE READY TO SUPPORT LOCAL**
15 **COMPETITION?**

16 **A.** No. BellSouth is asking this Commission to recommend that it receive Section
17 271 authority. In making its determination, the Commission must assess whether
18 BellSouth is providing nondiscriminatory access to the market for local service as
19 required by the Act. BellSouth's performance reports to date demonstrate that its
20 data is unreliable and must be subjected to significantly more scrutiny before it
21 can be relied upon to establish that BellSouth complies with Section 271 of the
22 Act.

23 **Q. SETTING ASIDE FOR A MOMENT THE CONCERNS ABOUT THE**
24 **ACCURACY OF THE DATA, DOES THE REPORTED DATA**
25 **DEMONSTRATE THAT BELLSOUTH MEETS THE PERFORMANCE**
26 **STANDARDS IN THE PROPOSED INTERIM SQM?**

27 **A.** No. BellSouth claims that its proposed interim SQM is based on the SQM
28 approved by the Georgia Public Service Commission ("Georgia Commission" or

1 “GPSC”). BellSouth has not yet performed to the standards established by the
2 Georgia Commission and must pay \$7 million in penalties for “falling short of
3 standards for handling orders from competitors during March and April.” (*See*
4 Exhibit SEN-1.)

5 **Q. DOES BELLSOUTH FACE SIMILAR PENALTIES FOR ITS MAY**
6 **PERFORMANCE?**

7 **A.** Yes. Based on its May performance in Georgia, BellSouth owes payments for
8 discriminatory treatment to individual CLECs for 45 of the 78 measurement areas
9 required by the Georgia Commission’s enforcement plan.⁴ BellSouth owes
10 significant payments in two critical areas: (1) how long BellSouth takes to install
11 service for CLEC customers compared to how long BellSouth takes to install
12 service for its own customers, and (2) how quickly BellSouth performs the work
13 necessary to ensure that CLEC customers can receive all their calls after having
14 their number ported. The total payments BellSouth owes CLECs for May is over
15 \$5 million. (*See* Exhibit SEN-2.)

16 BellSouth also owes payments to Georgia based on its state-wide performance to
17 CLECs as a whole. As of May 31, 2001, BellSouth owes an additional payment
18 of \$8.1 million for violations of 10 of 79 measurement areas over a three month
19

⁴ In its September 29, 2000 Comments regarding the Staff Recommendation in Docket 7892-U which established this enforcement plan, the CLEC Coalition recommended that areas of the enforcement plan needed to be modified to fully address CLEC concerns. Although these concerns have not yet been addressed, BellSouth’s violations of the performance standards established by the Commission were substantial enough to have generated millions of dollars in penalties.

1 period, that is BellSouth missed its performance goals for three consecutive
2 months. (See Exhibit SEN-3.)

3 **Q. DO BELLSOUTH'S MAY AND JUNE MONTHLY STATE SUMMARY**
4 **("MSS") REPORTS FOR KENTUCKY ALSO INDICATE DEFICIENT**
5 **PERFORMANCE?**

6 **A.** Yes. BellSouth witness Varner presented testimony to this Commission on
7 August 10, 2001 indicating that for May 2001, BellSouth failed the comparison
8 criteria for 73 submetrics, 15%. (See Supplemental Direct Testimony of
9 Alphonso J. Varner, Case No. 2001-105, filed August 10, 2001, ("*Varner Supp.*
10 *Dir.*") Attachment AJV-6 at 2.) BellSouth's June performance was similarly
11 deficient. BellSouth failed the comparison criteria for 57⁵ submetrics, 13%. (See
12 *id.*)

13 **Q. IN HIS TESTIMONY, MR. VARNER STATES THAT BELLSOUTH'S**
14 **PREVIOUSLY DEFICIENT PERFORMANCE HAS BEEN CORRECTED,**
15 **DO YOU AGREE?**

16 **A.** No. In his August 10 filing, Mr. Varner suggests that BellSouth has remedied
17 significant performance failures. For example, Mr. Varner admits that BellSouth
18 discriminated against CLECs using LENS to obtain customer service records.
19 (*Varner Supp. Dir.* at 24-25.) Mr. Varner alleges this problem was fixed on

⁵ BellSouth's performance was deficient in three additional measures: Average Jeopardy Notice Interval, FOC & Reject Completeness, and LNP Disconnect Timeliness. Mr. Varner excluded these measures in his analysis of BellSouth's June performance. See *Varner Supp. Dir.*, AJV-6 at 2-3. Had these measures been included, BellSouth's performance would have been worse. It is also important to note that BellSouth believes the LNP Disconnect Timeliness measure is not being appropriately calculated. AT&T does not fully understand Mr. Varner's comments regarding this measure set forth on pages 2 and 3 of *Varner Supp. Dir.*, AJV-6; however, AT&T agrees that BellSouth's calculation is not correct as it is not compliant with the Georgia Commission's Order.

1 July 28, 2001. CLECs cannot confirm that BellSouth implemented a fix or
2 whether a fix is working. This data will not be available until September 21, 2001
3 at the earliest. Without reliable data to confirm BellSouth has ceased its
4 discriminatory treatment, this Commission cannot know whether this problem has
5 been resolved.

6 Similarly, Mr. Varner acknowledges that BellSouth's flow through performance
7 is "well below the 90% objectives." (*Varner Supp. Dir.*, AJV-6 at 16.) Indeed,
8 BellSouth has failed to satisfy this measure in three out of four areas. Flow
9 through is a key aspect by which BellSouth's readiness to support CLEC entry
10 into the local exchange market may be assessed. Even though Mr. Varner
11 explains many laudable steps BellSouth will take to improve its flow through
12 performance, he does not indicate when BellSouth will provide data evidencing
13 its progress.

14 This Commission should not evaluate whether BellSouth provides
15 nondiscriminatory access to local services until BellSouth can provide verified
16 data demonstrating it satisfies the standards in this fundamental area.

17 **Q. HAS AT&T BECOME AWARE OF ADDITION PROBLEMS**
18 **CONCERNING BELL SOUTH'S FLOW THROUGH REPORTING?**

19 **A.** Yes, BellSouth is now indicating problems with its flow-through reports in a note
20 on its July flow-through report posted to its PMAP website. Further, BellSouth
21 witness Ronald M. Pate admitted at a recent South Carolina hearing that a systems
22 change implemented in early June causes inaccuracies in the classification of
23 orders on the flow through report. Specifically, he indicated that orders may be

1 improperly classified as designed fall-out (which BellSouth excludes from its
2 calculation) when in fact those orders fell out due to BellSouth errors and as such
3 should have been included in the calculation.

4 **Q. GOING BACK TO THE RELIABILITY OF THE REPORTED DATA,**
5 **HAS BELL SOUTH HAD DIFFICULTY PROVIDING ACCURATE,**
6 **RELIABLE PERFORMANCE DATA AND PERFORMANCE DATA**
7 **REPORTS?**

8 **A.** Yes. For example, BellSouth experienced considerable difficulty in providing
9 CLECs and the Georgia Commission with timely and accurate May 2001
10 performance reports. Indeed, as described more fully below, BellSouth posted its
11 May 2001 reports several times. The May 2001 reports are the first reports to be
12 generated by BellSouth that BellSouth claims comply with the Georgia
13 Commission's January 12, 2001 Order.⁶ For June 2001 data, BellSouth had
14 similar problems. BellSouth again had to repost CLEC and Aggregate reports for
15 10 metrics.⁷ Indeed, because of the changing nature of these reports, performing
16 any analysis of BellSouth's data has been like trying to hit a moving target.

⁶ See Order, *In re: Performance Measurements for Telecommunications Interconnection, Unbundling and Resale*, GPSC Docket No. 7892-U (Jan. 12, 2001) ("Georgia Order").

⁷ BellSouth reposted the following reports to its website: Total Service Order Cycle Time (CLEC and Aggregate) re-posted 7/31/2001, re-posted 8/1/2001, re-posted 8/7/2001; Total Service Order Cycle Time Offered (CLEC and Aggregate) re-posted 7/31/2001, re-posted 8/1/2001, re-posted 8/7/2001; LNP Total Service Order Cycle Time Offered (CLEC and Aggregate) re-posted 7/31/2001, re-posted 8/1/2001, re-posted 8/7/2001; Percent Provisioning Troubles within 30 Days (CLEC and Aggregate) re-posted 8/7/2001; Average Completion Notice Interval (CLEC and Aggregate) re-posted 8/7/2001; Jeopardy Interval Notice (CLEC and Aggregate) re-posted 8/7/2001; LNP Percent Missed Installation Appointments (CLEC and Aggregate) re-posted 8/7/2001; Order Completion Interval (CLEC and Aggregate) re-posted 8/7/2001; Percent Missed Installation Appointments (CLEC and Aggregate) re-posted 8/7/2001; Percent Provisioning Troubles within 30 Days (CLEC and Aggregate) re-posted 8/7/2001.

1 **Q. WHY ARE BELLSOUTH'S PROBLEMS IN GEORGIA RELEVANT TO**
2 **DATA PROVIDED TO THE KENTUCKY COMMISSION?**

3 **A.** They are relevant because BellSouth's Performance Measures and Analysis
4 Platform ("PMAP") is a regional system. Accordingly, deficiencies in one state's
5 performance measurement reports likely indicate similar deficiencies in the other
6 states. Additionally, as Mr. Varner has testified, BellSouth is reporting its data in
7 Kentucky using an Interim SQM which is purportedly the same SQM the
8 Georgia Commission adopted on January 12, 2001. (*See Varner Dir.* at 3-4.)

9 **Q. PLEASE DESCRIBE THE RECENT PROBLEMS CLECS HAVE**
10 **EXPERIENCED WITH BELLSOUTH'S MAY 2001 PERFORMANCE**
11 **REPORTS AND ASSOCIATED DATA IN GEORGIA.**

12 **A.** As early as June 30, 2001, CLECs could retrieve CLEC-specific "final"
13 performance reports for May 2001 from BellSouth's PMAP website.⁸ These
14 reports, however, were inaccurate. On July 5, BellSouth alerted CLECs that
15 because of "changes to PMAP reports required by the Georgia Commission[,] a
16 significant number of reports have been reposted to the PMAP website." (Exhibit
17 SEN-4.) In all, BellSouth reposted twenty-two reports.⁹ Four days later, on July
18 9, BellSouth advised CLECs via e-mail that it reposted two additional reports,

⁸ Interim reports are to be made available by the 21st of each month and final reports are to be made available by the 30th.

⁹ BellSouth reposted the following reports: LNP FOC; LNP Reject Interval; LNP % Rejected Service Requests; LNP Total Service Order Cycle Time; LNP Disconnect Timeliness; Reject Interval; % Rejections; Acknowledgement Timeliness; Acknowledgement Completeness; FOC Timeliness; Timeliness and Completeness-FOC and Reject Response; Pre-ordering OSS Response Interval; OSS Availability; Provisioning Percent Troubles in 30 days; Average Completion Notice Interval; Percent NXX LRN by LERG effective Date; Total Service Order Cycle Time; Missed Repair Appointments; Customer Trouble Report Rate; Maintenance Average Duration; % Repeat Troubles in 30 days; and Percent Out of Service Greater Than 24 Hours.

1 CLEC and SQM Average Completion Notice Interval and FOC and Reject
2 Completeness Reports, to its PMAP website.

3 **Q. DID BELLSOUTH PROVIDE THE GEORGIA COMMISSION WITH**
4 **ACCURATE MAY 2001 PERFORMANCE MEASUREMENT REPORTS?**

5 **A.** No. The May data BellSouth originally provided the Georgia Commission was
6 flawed. BellSouth first filed its May performance reports with the GPSC on July
7 3, 2001. Seven days later, however, on July 10, 2001, BellSouth submitted its
8 revised May MSS to the Georgia Commission.¹⁰ (See Exhibit SEN-5.) In its
9 cover letter, BellSouth indicated that the original reports were inaccurate. (See
10 Exhibit SEN-6.) BellSouth explained that there were “errors in the calculations
11 associated with the production of Average Completion Notice Interval and Reject
12 and Firm Order Confirmation Completeness measures.” *Id.* BellSouth also
13 admits that the original report included clerical errors and “failed to reflect certain
14 performance data related to ISDN loops, Jeopardies, and BellSouth’s retail
15 ADSL.” *Id.* In all, BellSouth’s inaccurate data affected performance reporting
16 for 117 sub-metrics. *Id.*

17 **Q. HAS BELLSOUTH PROVIDED REVISED MAY PERFORMANCE**
18 **REPORTS?**

19 **A.** Yes.

¹⁰ BellSouth’s “corrected” May data was hardly timely. The Georgia Commission received the “corrected” May data a mere ten days before BellSouth was required to produce June performance measures data.

1 **Q. DID BELL SOUTH'S DATA REVISIONS SIGNIFICANTLY IMPACT ITS**
2 **COMPLIANCE DETERMINATIONS?**

3 **A.** Yes, the effect of BellSouth's data adjustments was significant. For example,
4 BellSouth indicated that the July 10 revised data significantly affected compliance
5 determinations in 7 metrics. In 5 cases, BellSouth reported its performance
6 changed from non-compliant to compliant and in 2 cases, its performance went
7 from compliant to non-compliant. (See Exhibit SEN-5.)

8 **Q. ARE THE REVISED REPORTS BELL SOUTH SUBMITTED TO THE**
9 **GEORGIA COMMISSION CORRECT?**

10 **A.** No. The revised performance reports BellSouth provided to the Georgia
11 Commission on July 10 are still flawed. For example, BellSouth's report for the
12 Loop Make-Up Response Time—Electronic metric cannot be accurate. Although
13 it reports that 100% of the responses were returned in under 5 minutes, it also
14 reports that the average response interval was 16.85 minutes.¹¹

15 Additionally, BellSouth appears to report some data twice. For example, the data
16 for two different types of product disaggregation, loop/port combinations and the
17 UNE/Other Non-Design, are identical for the following measures:

- 18 • % Rejected Service Requests
- 19 • Reject interval
- 20 • FOC Timeliness
- 21 • FOC and Reject Response Completeness

¹¹ This information was obtained from BellSouth's July 3, 2001 SQM filing in Georgia. BellSouth, however, made no changes to its report for this metric in its July 10 filing in Georgia.

1 It is highly unlikely that both product types would have identical data for the same
2 month.

3 **Q. HAS AT&T IDENTIFIED SIMILAR PROBLEMS IN THE**
4 **PERFORMANCE REPORTS BELLSOUTH HAS SUBMITTED IN**
5 **KENTUCKY?**

6 **A.** Yes. BellSouth acknowledges it has reported data for UNE Loop & Port
7 Combinations twice: once in its submeasure and again in the UNE Other Non-
8 Design submeasure. This problem has occurred in BellSouth's May and June
9 2001 Kentucky performance reports. (*See Varner Supp. Dr.*, AJV-6 at 11.) This
10 double reporting of data affects the accuracy and reliability of as many as 15
11 submeasures.¹²

12 **Q. HAS BELLSOUTH IDENTIFIED OTHER PROBLEMS WITH THE DATA**
13 **BELLSOUTH HAS REPORTED IN KENTUCKY?**

14 **A.** Yes. BellSouth has determined that its May data calculations were "deficient" for
15 three measures, Average Jeopardy Notice Interval, FOC and Reject Completeness
16 and LNP Disconnect Timeliness measures.¹³ Calculation errors in these three
17 measures may render inaccurate BellSouth's data and data reporting for as many
18 as 78 of the 487 total submeasures on which BellSouth reported performance

¹² The affected measures are: % Rejected Service Requests-Mechanized; % Rejected Service Requests-Partially Mechanized; % Rejected Service Requests-Non-Mechanized; Reject Interval - Mechanized; Reject Interval - Partially Mechanized; Reject Interval - Non Mechanized; FOC Interval - Mechanized; FOC Interval - Partially Mechanized; FOC Interval - Non Mechanized; FOC and Reject Completeness-Mechanized; FOC and Reject Completeness-Partially Mechanized; FOC and Reject Completeness-Non-Mechanized; FOC and Reject Completeness (Multiple Responses) -Mechanized; FOC and Reject Completeness (Multiple Responses) -Partially Mechanized; and FOC and Reject Completeness (Multiple Responses) -Non-Mechanized.

¹³ *Varner Supp. Dir.*, AJV-6 at 2.

1 standards and CLEC activity in May. Accordingly, in this area alone, the
2 integrity of 15% of the data BellSouth reported in May is questionable. In June,
3 BellSouth excluded from its performance reports calculations for these measures.
4 Accordingly, BellSouth's June performance reports are inaccurate for as many as
5 75 of the 501 total submeasures on which BellSouth reported in June.

6 **Q. SO FAR YOU HAVE PROVIDED EXAMPLES OF MISSING DATA AND**
7 **DOUBLE COUNTING OF DATA, ARE THERE OTHER FACTORS**
8 **THAT CALL INTO QUESTION THE ACCURACY OF THE DATA**
9 **BELLSOUTH HAS SUBMITTED TO THIS COMMISSION?**

10 **A.** Yes. For example, in BellSouth's Kentucky May MSS, loop port combinations-
11 non-dispatch reports a volume of 2,407 in the Missed Appointments metric and a
12 volume of 1,463 in the combined mechanized and non-mechanized Completion
13 Notice metric. (*See Varner Supp. Dir.*, at AJV-6). BellSouth's performance
14 measures business rules indicate that the volumes should be the same for these
15 measures. Indeed, both measures rely on completed orders and the same
16 exclusions apply under the SQM. Yet, BellSouth's reports indicate a 39%
17 difference (944) in the volumes used to calculate these measures. The low
18 volume of reported completion notices demonstrates that either BellSouth is not
19 returning completion notices on a significant number of orders or is not tracking
20 its performance and including it in the performance report.

21 **Q. IS BELLSOUTH'S JUNE MSS REPORT SIMILARLY FLAWED?**

22 **A.** Yes. The June MSS report for Kentucky also contained discrepancies between
23 the Missed Appointments metric and Completion Notices metric for loop & port
24 combinations. For example, in loop & port combinations non-dispatch, BellSouth
25 reported 655 in the Missed Appointment metric and 599 in the Completion

1 Notices metric, a 9% difference. While this disparity is not a great as in May,
2 these numbers should be identical. Any difference between the data in these
3 reports indicates problems either in BellSouth's data, data reporting, or both.

4 Greater disparity exists in the data reported for the loop & port combinations –
5 dispatch submeasure. For this submeasure, BellSouth reports a volume of 71 in
6 the Missed Appointments metric and a volume of 104 in the combined
7 mechanized and non-mechanized Completion Notice metric. These volumes
8 should match. As with the loop & port combinations non-dispatch, the
9 measurements for the Missed Appointment metric and Completion Notice
10 Interval rely on completed orders and, under the SQM, the same exclusions apply
11 to each measure. That there is a difference of 31% between these volumes again
12 calls into question the validity of BellSouth's data and data reporting.

13 **Q. HAVE YOU IDENTIFIED OTHER DISCREPANCIES IN BELLSOUTH'S**
14 **MAY MSS REPORT FOR KENTUCKY?**

15 **A.** Yes. BellSouth reports differing volumes for measures that should have identical
16 volumes because the same data is used to generate the reports. For example,
17 according to BellSouth's SQM business rules, % Rejected Service Request,
18 FOC/Reject Completeness, and FOC/Reject Response Completeness measures all
19 use the same denominator, the number of Local Service Requests ("LSRs")
20 received. Accordingly, the volume data for each of these measures should match.
21 AT&T's analysis of the data BellSouth reported for these measures in its May
22 MSS report demonstrates the data does not match. As illustrated in the chart
23 below, AT&T has identified significant discrepancies in BellSouth's reported data

1 for UNEP and LNP (Stand-alone) in May. All of the items in a row of the
 2 following table should contain the same volume number; they do not.

3 UNE-P

	% Rejected Volume	FOC/Rej. Volume	FOC/Rej. Volume Multiple Responses
Fully Mechanized	2,419	2,419	2,279
Partially Mechanized	1,174	1,174	1,174
Non-mechanized	45	53	51

4

5

6 LNP Stand-alone

7

	% Rejected Volume	FOC/Rej. Volume	FOC/Rej. Volume Multiple Responses
Fully Mechanized	328	62	62
Partially Mechanized	326	501	501
Non-mechanized	49	153	153

8

9 **Q. DID BELLSOUTH CORRECT THIS PROBLEM IN ITS JUNE MSS**
 10 **REPORT?**

11 **A.** No. As the chart below illustrates, BellSouth's June MSS Report contained
 12 similar data discrepancies for UNE-P and LNP (Stand-alone). Again, according
 13 to BellSouth business rules, the volume numbers should be the same for each of
 14 the three measures, but they are not.

15 UNE-P

	% Rejected Volume	FOC/Rej. Volume	FOC/Rej. Volume Multiple Responses
Fully Mechanized	1,830	1,830	1,631
Partially Mechanized	1,317	1,317	1,317
Non-mechanized	70	84	83

16

17

1 LNP Stand-alone

	% Rejected Volume	FOC/Rej. Volume	FOC/Rej. Volume Multiple Responses
Fully Mechanized	439	49	49
Partially Mechanized	318	648	648
Non-mechanized	132	146	146

2

3

4

**Q. HAS AT&T IDENTIFIED DISCREPANCIES IN THE DATA SETS
BELLSOUTH USES TO GENERATE AT&T'S PMAP REPORTS?**

5

6

A. Yes. For example, the Firm Order Confirmation and Reject Response

7

Completeness report in PMAP is intended to contain the number of FOCs and

8

Reject responses issued in any given month. The raw data for the FOC and Reject

9

Response Completeness report lists all of the LSRs BellSouth receives during the

10

report period and shows whether each LSR submitted during the report period

11

received a FOC or was rejected. Accordingly, the FOC and Reject Response

12

Completeness report should contain information for each LSR submitted in a

13

reporting period.

14

AT&T analyzed the May 2001 raw data BellSouth provided for OCN 8392 and

15

discovered 82 LSRs existed in the combined FOC and Reject raw data that were

16

not included in BellSouth's FOC and Reject Completeness raw data. AT&T also

17

discovered 121 LSRs in the FOC and Reject Response Completeness raw data

18

file that were not included in the FOC and Reject raw data files. I have attached

19

as Exhibit SEN-7 K.C. Timmons' letter to Jan Flint that further details this

20

problem.

21

These inconsistencies raise serious concerns regarding the integrity of

22

BellSouth's PMAP data. Until this issue is resolved, this Commission cannot

1 rely on BellSouth's data to support a finding of Section 271 checklist
2 compliance.

3 **Q. ARE THERE EXAMPLES OF DATA MISSING FROM THE DATA SETS**
4 **BELLSOUTH USES TO COMPILE ITS KENTUCKY PERFORMANCE**
5 **REPORTS?**

6 **A.** Yes. BellSouth has acknowledged it is having difficulty capturing data necessary
7 to compile accurate performance measures reports. (*See Varner Supp. Dir.*, AJV-
8 6 at 13 & 40.) For the FOC Timeliness for LNP Standalone and Reject Interval-
9 residence and Reject Interval-business submeasures, BellSouth suggests its
10 performance was understated due to its inability to capture data regarding
11 multiple issues of the same version of an LSR that could have been rejected. Mr.
12 Varner states this problem resulted in BellSouth's performance being
13 inappropriately understated. (*See id.* at 13.)

14 In its testing in Florida, however, KCI has been able to accurately capture this
15 data. Indeed, KCI has determined that BellSouth does not meet the established
16 criteria for timely return of fully mechanized UNE FOCs. (*See Florida*
17 *Observation 95.*) Accordingly, until BellSouth corrects its data capturing
18 problem, this Commission and CLECs cannot assess whether BellSouth failed to
19 satisfy these submeasures because of deficient performance, as KCI has found, or
20 because of inaccurate performance data and unreliable performance measurement
21 reports.

1 **Q. IN YOUR JULY 9 TESTIMONY, YOU ALSO EXPLAINED THAT**
2 **BELLSOUTH'S PERFORMANCE MEASURES DATA DID NOT**
3 **INCLUDE AT&T OCN 7125 DATA FOR ITS LNP ORDERING**
4 **REPORTS. HAS THIS PROBLEM BEEN CORRECTED?**

5 **A.** No. Based on AT&T's review of the raw data for one measure (FOC Timeliness)
6 in May 2001, AT&T determined that over 350 PONS are missing from
7 BellSouth's May 2001 raw data for OCN 7125. Thus, for these PONS, AT&T
8 did not received any FOC performance data from BellSouth. (*See* letter dated
9 July 16 from K.C. Timmons to Jan Flint, attached as Exhibit SEN-8.) Indeed, a
10 total of 406 PONS are missing from the raw data for this measure. This
11 represents slightly under half of the PONS AT&T should have received.

12 BellSouth has confirmed that these PONS are missing from the raw data files but
13 it is "unable to determine the cause of the PONS not appearing in the LNP raw
14 data." (Letter dated August 8, 2001 from Jan Flint to K.C. Timmons, attached as
15 Exhibit SEN-9.) Accordingly, this significant data problem remains unresolved.

16 **Q. ARE THERE OTHER EXAMPLES OF AT&T INFORMATION THAT IS**
17 **MISSING FROM BELLSOUTH'S PERFORMANCE REPORTS?**

18 **A.** Yes. BellSouth's May 2001 performance reports continued to omit AT&T data.
19 For example, the data BellSouth posted on the PMAP website does not include all
20 of AT&T's Broadband data. Indeed, the May performance reports did not include
21 some AT&T Broadband PMAP performance reports. On July 5, 2001, AT&T
22 asked BellSouth why it had not provided these reports. BellSouth explained that
23 it had made errors during database clean up and was working to correct the
24 problem.

1 **Q. HAS BELLSOUTH CORRECTED THIS PROBLEM?**

2 **A.** As of July 10, 2001, AT&T still had not received any indication from BellSouth
3 when its AT&T Broadband data would be provided. AT&T contacted BellSouth
4 on July 10 to determine the status of the missing data. At that time, BellSouth
5 indicated that the missing AT&T Broadband data issue was not resolved and
6 stated that other CLECs were also missing similar data. BellSouth informed
7 AT&T that it would attempt to have the missing data issue resolved by the next
8 reporting period. BellSouth explained the only way AT&T could have access to
9 its May AT&T Broadband data would be for BellSouth to manually recreate the
10 May reports.

11 On July 10, AT&T requested that BellSouth provide manual copies of the AT&T
12 Broadband reports that were unavailable on BellSouth's PMAP website. AT&T
13 has not received this information and does not know when BellSouth will provide
14 the missing data.

15 **Q. DOES BELLSOUTH ALSO INTENTIONALLY EXCLUDE**
16 **INFORMATION FROM ITS PERFORMANCE REPORTS?**

17 **A.** Yes. BellSouth has inappropriately excluded data from some of its reports. For
18 example, BellSouth has excluded "dummy" FOCs from the FOC Timeliness
19 Measure.¹⁴ A "dummy" FOC is a real FOC and serves a critical function for
20 CLECs. It is a confirmation that tells CLECs that BellSouth has received a notice
21 to cancel a customer's service request before the order was issued. An important

¹⁴ The details of this problem are set forth more fully on page 11 of my July 9, 2001 Rebuttal Testimony.

1 reason that a CLEC would issue a cancellation shortly after issuing a request for
2 service is that the customer changed his mind and no longer wanted the CLEC to
3 complete his order. Failure to promptly process this customer change could result
4 in a disruption of service and negatively impact customer-CLEC relations.
5 Therefore, it is crucial for CLECs to have confirmation that the original LSR has,
6 in fact, been cancelled.

7 **Q. WHY SHOULD DATA REGARDING THIS TYPE OF FOC BE**
8 **INCLUDED IN THE FOC TIMELINESS MEASURE?**

9 **A.** BellSouth's SQM does not permit BellSouth to exclude these FOCs. Indeed,
10 these FOCs are just as important to CLECs as other types of FOCs and excluding
11 them from the FOC Timeliness Measure can permit BellSouth to discriminate
12 against CLECs and remove any incentive to perform this activity in a timely
13 manner.

14 **Q. ARE THERE OTHER IMPORTANT AREAS IN WHICH BELL SOUTH'S**
15 **DATA INTEGRITY IS AFFECTED BY BELL SOUTH'S**
16 **UNAUTHORIZED EXCLUSIONS?**

17 **A.** Yes. AT&T has identified three areas in which BellSouth has unilaterally decided
18 to exclude data from certain performance measurement reports. These areas are:

- 19 (1) Directory Listing Orders for certain ordering measures;
20 (2) Orders classified as Projects for certain ordering measures; and
21 (3) LSRs submitted in one month and rejected in another.
22

23 **Q. WHY DO THESE EXCLUSIONS MATTER?**

24 **A.** In each case, BellSouth is unilaterally determining what data this Commission
25 will be able to evaluate. As a result of these exclusions, hundreds of service
26 orders will not be measured pursuant to an approved SQM and will not be
27
28

1 included in BellSouth's performance reports. Thus, by excluding this data,
2 BellSouth can mask deficient performance in these key areas. Without complete
3 accurate data, neither this Commission nor CLECs can appropriately gauge
4 whether BellSouth is satisfying its obligation to provide nondiscriminatory access
5 to local services.

6 **Q. HAS BELL SOUTH PROPOSED TO EXCLUDE ADDITIONAL DATA**
7 **FROM ITS PERFORMANCE REPORTING IN KENTUCKY?**

8 **A.** Yes. On page 10 of his August 10, 2001 Supplemental Direct Testimony, Mr.
9 Varner discusses BellSouth's failure to satisfy the established benchmarks for the
10 Reject Interval / Combo (Loop & Port) mechanized and the Reject Interval/ Other
11 Non-Design mechanized measures.¹⁵ Mr. Varner alleges that many of the LSRs
12 that did not meet the benchmark were issued between 11:00 p.m. and 4:00 a.m.
13 Mr. Varner contends BellSouth's deficient performance was a result of the fact
14 that its back-end legacy systems are out of service during that time period.
15 Therefore, Mr. Varner suggests these hours should be excluded from
16 measurement.

17 **Q. IS MR. VARNER'S SUGGESTION THAT THESE LSRs BE EXCLUDED**
18 **FROM THESE MEASURES A REASONABLE SOLUTION TO THIS**
19 **PROBLEM?**

20 **A.** No. Mr. Varner's proposition to exclude this data is unreasonable because the
21 interface BellSouth provides to CLECs for submitting service requests is available
22 during this period of time. CLECs, therefore, are not on notice that an LSR

¹⁵ Mr. Varner indicates the established benchmark for these measures is $\geq 97\%$ within one hour. (See *Varner Supp. Dir.* at 10.)

1 accepted through the interface could be in a holding period until the legacy back-
2 end systems go back online. BellSouth should not be allowed to exclude data
3 reflecting its performance simply because its processes have design flaws that
4 allow this situation to occur. This problem directly impacts this Commission's
5 determination as to whether BellSouth presently complies with the Act's checklist
6 items. Excluding this data will obscure BellSouth's true performance in this area.

7 **Q. IN YOUR VIEW, IS THERE A BETTER WAY TO ADDRESS THIS**
8 **PROBLEM?**

9 **A.** Yes. BellSouth could address this problem in two ways. First, BellSouth could
10 make its legacy system available for the time CLECs have access to its interfaces.
11 Second, BellSouth could work with CLECs to resolve this problem through its
12 change control process.

13 **Q. CAN THIS COMMISSION RELY ON BELLSOUTH'S PERFORMANCE**
14 **REPORTS TO ESTABLISH CHECKLIST COMPLIANCE?**

15 **A.** No. BellSouth's inability to provide timely and accurate performance data that
16 complies with the Georgia Commission's Order as well as the data discrepancies
17 identified in the reports BellSouth has submitted to this Commission seriously
18 undermines the reliability of BellSouth's self-reported performance data. The
19 problems BellSouth has experienced with providing its May and June data not
20 only show that the actual data reported is inaccurate, but also that the significant
21 changes BellSouth has made to PMAP have resulted in an unstable and unreliable
22 reporting system.

1 **Q. IN CONNECTION WITH THE THIRD-PARTY TESTING OF**
2 **BELLSOUTH'S OSS, HAS BELLSOUTH SATISFIED KEY DATA**
3 **INTEGRITY EXCEPTIONS IDENTIFIED BY KPMG CONSULTING,**
4 **INC. ("KCI")?**

5 **A.** No. As I discussed in my July 9, 2001 testimony, during the course of its OSS
6 testing in Georgia, KCI has identified a number of key exceptions that affect
7 BellSouth's data integrity.¹⁶ These exceptions are still open and work remains to
8 be completed before KCI can evaluate whether BellSouth has adequately
9 addressed these issues. Indeed, KCI has indicated that it will re-test Georgia
10 Exceptions 86, 89, 136, and 137 using BellSouth's June or July 2001 performance
11 data. KCI has not yet conducted its retesting.

12 **Q. IS KCI'S OSS TESTING IN FLORIDA ALSO UNCOVERING**
13 **NUMEROUS PROBLEMS RELATING TO THE RELIABILITY OF**
14 **BELLSOUTH'S PERFORMANCE MEASUREMENT REPORTING?**

15 **A.** Yes. KCI's testing in Florida is also uncovering numerous problems relating to
16 the reliability of BellSouth's performance measurement reporting. Currently,
17 nine exceptions (Florida Exception Nos. 10, 11, 22, 27, 36, 78, 81, 95, and 101)
18 relating to performance measures are open. Many relate to the integrity of the
19 reports or the underlying data. For example, three of the exceptions were opened
20 because KCI cannot replicate BellSouth's performance reports, three because of
21 issues regarding BellSouth's data report calculation methodologies, one because
22 of BellSouth's inadequate processes for management and resolution of metrics
23 issues, one because of ambiguous SQM business that could lead to misleading

¹⁶ Some of the open exceptions that related to data integrity issues are 79 (data retention), 86 (% Troubles in 30 days replication), 89 (data integrity - % Troubles in 30 days), 136 and 137 (related to TAG data not recoverable by BellSouth).

1 metrics results, and one because of BellSouth's lack of adherence to the change
2 control process for performance metrics.

3 **Q. WHAT IS THE CURRENT STATUS OF THE FLORIDA THIRD-PARTY**
4 **OSS TEST?**

5 **A.** The chart below summarizes the current status of the Florida third-party OSS test:

Performance Measures Test	Per Cent Complete
PMR-1 Data Collection and Storage	76%
PMR-2 Definitions and Standards Review	59%
PMR-3 Metrics Change Management Review	78%
PMR-4 Data Integrity Review	13%
PMR-5 Metric Calculation Verification and Validation Review	
1 st Round	79%
2 nd Round	54%
3 rd Round	24%

6 Currently, KCI's data integrity review (PMR-4) is only 13% complete.

7 These analyses of BellSouth's data are critical steps in determining whether
8 BellSouth's data is reliable. A satisfactory resolution to these exceptions and
9 testing is necessary before this Commission can be assured that BellSouth has
10 addressed these deficiencies.

11 **Q. WHAT IS THE STATUS OF THE GEORGIA PERFORMANCE**
12 **MEASUREMENT REVIEW KCI IS CONDUCTING?**

13 **A.** The Georgia performance review is still in its early stages. KCI's July 31, 2001
14 status report indicates that its evaluation of BellSouth's SQM measures may be
15 complete in late September, and that its review of enforcement measures will not

1 be complete until late December, 2001. Both of these estimated completion dates
2 assume KCI's evaluation does not discover any deficiencies.

3 **Q. SHOULD THIS COMMISSION RELY UPON ANY OF BELL SOUTH'S**
4 **SELF-REPORTED DATA FOR PURPOSES OF ANALYZING WHETHER**
5 **BELL SOUTH PROVIDES NONDISCRIMINATORY ACCESS TO ITS**
6 **NETWORK?**

7 **A.** No. Missing data and inconsistencies between reports call into question the
8 performance reports BellSouth submits. Moreover, the data have not yet been
9 subjected to the scrutiny of independent third-party audits ordered by the Georgia
10 and Florida Commissions. The data are simply not reliable, accurate, or
11 complete. BellSouth is unable to provide this Commission any assurance of the
12 accuracy of its data. BellSouth's May and June 2001 data problems demonstrate
13 that BellSouth's performance reporting systems are not mature enough to handle
14 CLEC entry into the local exchange market. Accordingly, any attempt by
15 BellSouth to rely on self-generated performance reports to convince the Kentucky
16 Commission that BellSouth deserves Section 271 authority should be rejected
17 until BellSouth can establish that the underlying data are reliable.

18 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

19 **A.** Yes.

20

21

ATLANTA TECH

WEDNESDAY • July 11, 2001

BellSouth fines shadow long-distance bid

Michael E. Kanell - Staff
Wednesday, July 11, 2001

With BellSouth's request to enter long-distance on the line, state regulators have whacked the Atlanta-based company with \$7 million in fines.

The company was fined for falling short of standards for handling orders from competitors during March and April.

Additionally, a \$7 million fine for May's performance will be imposed unless the standards are adjusted. But the company has asked the state Public Service Commission for the money be put in escrow while the issue is discussed --- and commissioners have agreed to consider the request.

The penalties assessed by the PSC come with BellSouth arguing that its systems for handling competition are running smoothly. That requirement --- that local markets be open --- is required by federal law to justify the company's long-awaited entry into long-distance.

The commissioners have repeatedly delayed long-distance approval, asking BellSouth to improve its performance. They don't now say the application will be rejected, but the fines are a warning for the \$27 billion-a-year BellSouth.

Commissioner Lauren "Bubba" McDonald Jr. said that, at the least, BellSouth should be concerned. "If I saw \$3 million in fines for a month in my business, I'd start looking for the hole and try to plug it."

Added PSC Commissioner David Burgess: "If you are paying the money in penalties, and you don't yet have (long-distance) relief, I'd imagine that you would be concerned."

However, Burgess said the PSC will consider modifying the standards used to judge BellSouth. The standards were set in January and went into effect in March.

Competitors say the fines are proof that BellSouth has not opened those markets and doesn't deserve long-distance.

"This is what we have been saying all along," said Jaimie Hardin, AT&T vice president for law and government affairs. "This is just the first opportunity to see --- analytically --- whether they are meeting the mark or not. BellSouth systems are not mature, they are not stable and they are not capable of the level of service that is required to handle competitors."

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BellSouth spokesman Joe Chandler said the fines are no sign the application is in trouble.

The company has spent more than \$1.6 billion on systems and staff to handle orders from competitors in its nine-state region, and the fines are just part of the commission's monitoring, he said.

"The Georgia Public Service Commission has established one of the most comprehensive and aggressive performance measurement and enforcement plans in the country to measure BellSouth's performance in providing service to local competitors. The commission's plan is working."

Changes in state and federal law were meant to spur competition in local and long-distance service that would lead to lower prices and more choice for consumers. BellSouth's competitors now have more than 3.2 million lines, including 820,000 in Georgia, accounting for 17 percent of the local phone market, Chandler said.

BellSouth needs permission from the Federal Communications Commission to offer long-distance in each of its nine states. But before, it wants the endorsement of local regulators.

The company has repeatedly predicted a pending state endorsement of its long-distance application --- eating its words later when approval was delayed. Now, BellSouth and its rivals are required to file comments on the long-distance case to the PSC by Monday.

Leon Bowles, head of the PSC's telecom staff, said the filings will take some time to read through. "The initial comments made a stack that was 2 1/2 feet high, so the reply could easily be 3 feet high."

That means PSC approval will likely not come until late August or September --- assuming that BellSouth's case is going smoothly.

The law requires BellSouth to meet a 14-point checklist that proves that its local market is open to competition. The key component is "parity" --- the ability to handle orders from other companies as quickly and smoothly as BellSouth handles its own.

That means making sure those competitors' customers receive dial tones and keep their numbers when they switch.

Of the remaining Bell companies, only Verizon and SBC Communications have been allowed into long-distance and only in a handful of states.

An assessment of BellSouth's performance in May is due within two weeks. A third consecutive month of penalties would trigger an additional state punishment that could run into the millions of dollars, according to the PSC.

AT&T's Hardin says she doesn't expect BellSouth's results for May to be any better than before. "We have not seen a significant improvement."

Georgia is the only state to impose penalties prior to providing long-distance permission. Verizon, for instance, paid millions of dollars in fines for mishandling local competitors' orders during its first months in long-distance.

The head start in Georgia is meant to ensure that problems with BellSouth's

systems will be vetted and corrected before long-distance is approved. BellSouth argues that the lines should be seen as proof that their performance will be under scrutiny even after long-distance approval.

Adding to the picture is the May launch of local service by WorldCom's reconstituted MCI unit.

BellSouth has pointed with mixed feelings to the efforts of competitors.

On one hand, it hates to lose business. But the more business it loses, the better the argument that its market is open and so it should be allowed into long-distance.

MCI's first month of competition was only a modest strain on BellSouth's systems --- about 6,800 customers switched to MCI, according to the PSC. But as MCI revs up its marketing machine with print and broadcast ads, there could be a wave of switchers. Glitches in handling the orders will undermine BellSouth's case for long-distance.

The PSC will be watching, Burgess said.

"In the next 35 or 45 days, there will be some information on the table that will help us get some decisions made," Burgess said. "And when it's right, we'll give it our stamp of approval."



Report: May Tier-1 State Level Totals

State	Submetric	May 2001 Tier-1 Rmdy Payb Amt
Georgia	Acknowledgement Completeness	\$13,813.00
	Average Disconnect Timeliness Interval	\$3,419,000.00
	Billing Invoice Accuracy	\$497.00
	Billing Invoice Timeliness (Mean Time to Deliver Invoices)	\$95.00
	Customer Trouble Report Rate - Design	\$16,400.00
	Customer Trouble Report Rate - IC-Trunks	\$10,550.00
	Customer Trouble Report Rate - POTS	\$18,700.00
	Customer Trouble Report Rate - UNE Loops and Port Combos	\$6,000.00
	Customer Trouble Report Rate - UNE Loops GA Order	\$54,350.00
	Customer Trouble Report Rate - UNE XDSL	\$36,400.00
	Firm Order Confirmation Timeliness (Mechanized only)	\$42,710.00
	Firm Order Confirmation Timeliness (Non Mechanized)	\$2,680.00
	Firm Order Confirmation Timeliness (TRUNKS)	\$1,260.00
	Firm Order Confirmation Timeliness and Reject Completeness	\$20,190.00
	Maintenance Average Duration - Design	\$300.00
	Maintenance Average Duration - POTS	\$825.00
	Maintenance Average Duration - UNE Loop and Port Combos	\$800.00
	Maintenance Average Duration - UNE Loops GA Order	\$2,400.00
	Order Completion Interval - IC Trunks	\$850.00
	Order Completion Interval - POTS	\$743,400.00
	Order Completion Interval - UNE Loop and Port Combos	\$316,200.00
	Order Completion Interval - UNE Loops GA Order	\$54,750.00
	Percent Flow-Through Service Request (Detail) -Business	\$9,253.00
	Percent Flow-Through Service Request (Detail) -LNP	\$6,172.00
	Percent Flow-Through Service Request (Detail) -Residence	\$76,779.00
	Percent Flow-Through Service Request (Detail) -UNE	\$90,320.00
	Percent Missed Installation Appointments - IC-Trunks	\$625.00
	Percent Missed Installation Appointments - POTS	\$1,300.00
	Percent Missed Installation Appointments - UNE Loop and Port Combos	\$4,800.00
	Percent Missed Installation Appointments - UNE Loops GA Order	\$1,600.00
	Percent Missed Repair Appointments - POTS	\$700.00
	Percent Missed Repair Appointments - UNE Loop and Port Combos	\$1,600.00
	Percent Missed Repair Appointments - UNE Loops GA Order	\$1,200.00
	Percent of cooperative testing for UNE-XDSL	\$200.00
Percent Provisioning Troubles within 30 days - IC-Trunks	\$400.00	
Percent Provisioning Troubles within 30 Days - POTS	\$600.00	

Percent Provisioning Troubles within 30 Days - UNE Loop and Port Combos	\$800.00
Percent Provisioning Troubles within 30 Days - UNE Loops GA Order	\$3,600.00
Percent Repeat Troubles within 30 Days - Design	\$375.00
Percent Repeat Troubles within 30 Days - POTS	\$1,825.00
Percent Repeat Troubles within 30 Days - UNE Loop and Port Combos	\$800.00
Percent Repeat Troubles within 30 days - UNE Loops GA Order	\$18,250.00
Percent Troubles in 7 days - Hot Cuts	\$800.00
Reject Interval (Mechanized only)	\$7,710.00
Trunk Group Performance CLEC Specific	\$8,625.00
TOTAL	\$5,002,504.00

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Report: Tier2 State Level Results EXT

		May 2001				
State	Submetric	Tier-2 Tot Aff Vol	Tier-2 Rmdy Calc Amt	Tier-2 Rmdy Adj Amt	Tier-2 Rmdy Int Amt	Tier-2 Rmdy Payb Amt
Georgia	Acknowledgement Completeness	728	\$17,879	\$0	\$0	\$17,879
	Average Disconnect Timeliness Interval	7,236	\$3,618,000	\$0	\$0	\$3,618,000
	Customer Trouble Report Rate - Design	2	\$600	\$0	\$0	\$600
	Firm Order Confirmation Timeliness (TRUNKS)	19	\$1,140	\$0	\$0	\$1,140
	Order Completion Interval - POTS	9,933	\$2,979,900	\$0	\$0	\$2,979,900
	Percent Flow-Through Service Request (Detail) -Residence	10,695	\$85,603	\$0	\$0	\$85,603
	Percent Flow-Through Service Request (Detail) -UNE	4,589	\$14,951	\$0	\$0	\$14,951
	Percent Response Received within 'X' seconds	71,620	\$1,432,390	\$0	\$0	\$1,432,390
	Reject Interval (Mechanized only)	23	\$1,380	\$0	\$0	\$1,380
	Timeliness of Change Management Notices	1	\$205	\$0	\$0	\$205

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Norris, Sharon - LGA

Subject: FW: PMAP Repost Notices for May 2001 Data

-----Original Message-----

From: Sherwood, Suzy [mailto:Suzy.Sherwood@BellSouth.COM]
Sent: Thursday, July 05, 2001 2:31 PM
To: 'watsonc@prepaid-solutions.com'; 'mhoward@talk.com';
'beth.day@mail.sprint.com'; 'carrie.j.smith@xo.com';
'jfury@newsouth.com'; 'kyle.kopytchak@networktelephone.net';
'shuter@gcccom.com'; 'kalane@broadband.att.com';
'vanderwp@madisonriver.net'; 'candice.hamilton@wcom.com';
'zachary.boudoin@kmctelecom.com'; 'thyge@deltacom.com';
'bczolba@emp.ctc.net'; 'lchase@covad.com'; 'bshepard@covad.com';
'moore@connectllc.com'; 'dwirsching@kpmg.com'; 'jacksheehan@kpmg.com';
'patspencer@ccitelecom.com'; 'btitele.com bbo.com'; 'tallen@covad.com';
'tsauder@birch.com'; Timmons, King C (K.C.), NCAM; Dennis, Matthew
(Matt), NCAM; 'teresa.davis@alltel.com'; 'bob.buerrosse@algx.com';
'jeannie.seguin@adelphia.com'; 'pagemiller@talk.com';
'rodny@accesscomm.com'; 'a_pcs@yahoo.com';
'wayne.mckenzie@cbeyond.net'; 'jmaa@atlantic.net';
'telcom@bellsouth.net'
Cc: Porter, Phillip
Subject: PMAP Repost Notices for May 2001 Data

Due to changes to PMAP reports required by the Georgia Order a significant number of reports have been reposted to the PMAP website. Our records indicate that you have pulled one or more of these reports prior to July 2, 2001. You will need to pull an updated version of any report that you accessed prior to this date to get a current version. These reports will be available on the website until July 19, 2001.

Listed below are the reports that have reposted.

LNP FOC
Firm Order Confirmation
LNP Reject Interval, % Reject Service Requests
Percent NXX LRN by LERG Effective Date (Aggregate)
Pre-Ordering OSS Response Interval
OSS Interface Availability SQM
TSOCT
TSOCT Offered
LNP TSOCT
M&R - CTRR, OSS>24, Average Duration, % Repeat Troubles w/in 30 Days, Missed Repair Appts
Ordering - Reject Interval, % Reject, FOC, Acknowledgement Message
Timeliness/Completeness,
FOC & Reject Response Completeness
FOC & Reject Response
LNP Disconnect Timeliness
Provisioning Percent Troubles w/in 30 Days
Average Completion Notice Interval

Information on reposting of reports can also be found in the Menu folder in the Help selection under Current Month Site Updates.

If you need additional information, please give me a call.

Suzy Sherwood
Measurement Analyst
404-927-4436
IPage: 800-821-6966 or ssherwood

271 Monthly State Summary Comparison Report

Item	Code	Description	Req	Pass	1-37	38-46	47-50	51-60	61-63	64-65	66-70	71-75	76-78	79-85	86-88	89-90	91-92	93-94	95-96	97-98	99-100
A.2.14.1.2	P2	Average Completion Notice Interval - Mechanized	Req	Pass	137	309	150	21	603	5483	0.03857	0.5707	YES	762	MSS						
A.2.14.1.2	P2	Response to 10 credits/Non-Dispatchable Hours	Req	Pass	137	309	150	21	603	5483	0.03857	0.5707	YES	762	MSS						
A.2.14.1.1	P3	ISDN/IC to credits/Dispatchable Hours	ISDN											762	MSS						
A.2.14.1.1	P3	ISDN/IC to credits/Dispatchable Hours	ISDN											767	MSS						
A.2.14.6.1.2	P5	ISDN/IC to credits/Non-Dispatchable Hours	ISDN											762	MSS						
A.2.14.6.1.2	P5	ISDN/IC to credits/Non-Dispatchable Hours	ISDN											767	MSS						
A.2.14.6.2.1	P3	ISDN/IC to credits/Dispatchable Hours	ISDN											762	MSS						
A.2.14.6.2.1	P3	ISDN/IC to credits/Dispatchable Hours	ISDN											767	MSS						
A.2.15.1.1	P2	Average Completion Notice Interval - Non-Mechanized	Diagnostic											762	MSS						
A.2.15.1.1	P2	Response to 10 credits/Dispatchable Hours	Diagnostic											767	MSS						
A.2.15.3.1.1	P5	Design Dispatchable to credits/Dispatchable Hours	Diagnostic											762	MSS						
A.2.15.3.1.1	P5	Design Dispatchable to credits/Dispatchable Hours	Diagnostic											767	MSS						
A.2.15.6.1.1	P3	ISDN/IC to credits/Dispatchable Hours	Diagnostic											762	MSS						
A.2.15.6.1.1	P3	ISDN/IC to credits/Dispatchable Hours	Diagnostic											767	MSS						
A.2.15.6.1.2	P3	ISDN/IC to credits/Non-Dispatchable Hours	Diagnostic											762	MSS						
A.2.15.6.1.2	P3	ISDN/IC to credits/Non-Dispatchable Hours	Diagnostic											767	MSS						
B.1.14.1.2	D11	ISW Analog Loop w/LNRP Non-Designable %		>=95%										YES	762	MSS					
B.1.14.1.2	D11	ISW Analog Loop w/LNRP Non-Designable %		>=95%										YES	767	MSS					
B.1.14.1.3	D11	ISW Analog Loop w/LNRP Non-Designable %		>=95%										YES	762	MSS					
B.1.14.1.3	D11	ISW Analog Loop w/LNRP Non-Designable %		>=95%										YES	767	MSS					
B.1.14.1.7	D11	LNRP Standalone/DA %		>=95%										YES	762	MSS					
B.1.14.1.7	D11	LNRP Standalone/DA %		>=95%										YES	767	MSS					
B.1.15.1.2	D11	ISW Analog Loop w/LNRP Non-Designable %		>=95%										YES	762	MSS					
B.1.15.1.2	D11	ISW Analog Loop w/LNRP Non-Designable %		>=95%										YES	767	MSS					
B.1.15.1.3	D11	ISW Analog Loop w/LNRP Non-Designable %		>=95%										YES	762	MSS					
B.1.15.1.3	D11	ISW Analog Loop w/LNRP Non-Designable %		>=95%										YES	767	MSS					
B.1.15.1.7	D11	LNRP Standalone/DA %		>=95%										YES	762	MSS					
B.1.15.1.7	D11	LNRP Standalone/DA %		>=95%										YES	767	MSS					
B.1.16.1.2	D11	ISW Analog Loop w/LNRP Non-Designable %		>=95%										YES	762	MSS					
B.1.16.1.2	D11	ISW Analog Loop w/LNRP Non-Designable %		>=95%										YES	767	MSS					
B.1.16.1.3	D11	ISW Analog Loop w/LNRP Non-Designable %		>=95%										YES	762	MSS					
B.1.16.1.3	D11	ISW Analog Loop w/LNRP Non-Designable %		>=95%										YES	767	MSS					
B.1.16.1.7	D11	LNRP Standalone/DA %		>=95%										YES	762	MSS					
B.1.16.1.7	D11	LNRP Standalone/DA %		>=95%										YES	767	MSS					
B.1.17.1.2	D11	ISW Analog Loop w/LNRP Non-Designable %		>=95%										YES	762	MSS					
B.1.17.1.2	D11	ISW Analog Loop w/LNRP Non-Designable %		>=95%										YES	767	MSS					
B.1.17.1.3	D11	ISW Analog Loop w/LNRP Non-Designable %		>=95%										YES	762	MSS					
B.1.17.1.3	D11	ISW Analog Loop w/LNRP Non-Designable %		>=95%										YES	767	MSS					
B.1.17.1.7	D11	LNRP Standalone/DA %		>=95%										YES	762	MSS					
B.1.17.1.7	D11	LNRP Standalone/DA %		>=95%										YES	767	MSS					
B.1.18.1.2	D11	ISW Analog Loop w/LNRP Non-Designable %		>=95%										YES	762	MSS					
B.1.18.1.2	D11	ISW Analog Loop w/LNRP Non-Designable %		>=95%										YES	767	MSS					
B.1.18.1.3	D11	ISW Analog Loop w/LNRP Non-Designable %		>=95%										YES	762	MSS					
B.1.18.1.3	D11	ISW Analog Loop w/LNRP Non-Designable %		>=95%										YES	767	MSS					
B.1.18.1.7	D11	LNRP Standalone/DA %		>=95%										YES	762	MSS					
B.1.18.1.7	D11	LNRP Standalone/DA %		>=95%										YES	767	MSS					
B.1.19.1.2	D11	ISW Analog Loop w/LNRP Non-Designable %		>=95%										YES	762	MSS					
B.1.19.1.2	D11	ISW Analog Loop w/LNRP Non-Designable %		>=95%										YES	767	MSS					
B.1.19.1.3	D11	ISW Analog Loop w/LNRP Non-Designable %		>=95%										YES	762	MSS					
B.1.19.1.3	D11	ISW Analog Loop w/LNRP Non-Designable %		>=95%										YES	767	MSS					
B.1.19.1.7	D11	LNRP Standalone/DA %		>=95%										YES	762	MSS					
B.1.19.1.7	D11	LNRP Standalone/DA %		>=95%										YES	767	MSS					
B.2.1.3.1	P4	Loop + Port Combination 10 credits/Dispatchable Hours	R8B		6.24	48.077	5.59	50	12.952	17.623	2.0018	YES	762	MSS							
B.2.1.3.1	P4	Loop + Port Combination 10 credits/Dispatchable Hours	R8B		6.45	48.077	5.24	50	12.952	17.623	2.0029	YES	767	MSS							
B.2.1.3.1.2	P4	Loop + Port Combination 10 credits/Non-Dispatchable Hours	R8B		1.04	451.74	1.07	7.851	2.715	0.53096	1.6306	YES	762	MSS							
B.2.1.3.1.2	P4	Loop + Port Combination 10 credits/Non-Dispatchable Hours	R8B		1.04	451.74	1.07	7.851	2.715	0.53096	1.6291	YES	767	MSS							
B.2.1.3.2	P4	Loop + Port Combination 10 credits/Dispatchable Hours	R8B		15.83	181	1.33	6	31.181	3.79671	1.650	YES	762	MSS							
B.2.1.3.2	P4	Loop + Port Combination 10 credits/Dispatchable Hours	R8B		15.83	181	1.33	6	31.181	3.79671	1.6418	YES	767	MSS							
B.2.5.3	P2	Loop + Port Combination/DA %	R8B		0.76%	157.355	0.76%	157.355	0.76%	157.355	0.76%	YES	762	MSS							
B.2.5.3	P2	Loop + Port Combination/DA %	R8B		0.76%	157.355	0.76%	157.355	0.76%	157.355	0.76%	YES	767	MSS							
B.2.6.3	P2	Loop + Port Combination/DA %	Diagnostic											762	MSS						
B.2.6.3	P2	Loop + Port Combination/DA %	Diagnostic											767	MSS						
B.2.8.3	P2	Loop + Port Combination/DA %		>=48 hrs										YES	762	MSS					
B.2.8.3	P2	Loop + Port Combination/DA %		>=48 hrs										YES	767	MSS					
B.2.9.3	P2	Loop + Port Combination/DA %	Diagnostic											762	MSS						
B.2.9.3	P2	Loop + Port Combination/DA %	Diagnostic											767	MSS						
B.2.10.3.1	P3	Loop + Port Combination 10 credits/Dispatchable Hours	R8B		3.04%	53.118	3.04%	7.79	0.90789	1.1679	YES	762	MSS								
B.2.10.3.1	P3	Loop + Port Combination 10 credits/Dispatchable Hours	R8B		3.04%	53.118	3.04%	7.79	0.90789	1.1674	YES	767	MSS								
B.2.10.3.2	P3	Loop + Port Combination 10 credits/Non-Dispatchable Hours	R8B		0.76%	486.571	0.76%	16.433	0.63333	2.2135	YES	762	MSS								
B.2.10.3.2	P3	Loop + Port Combination 10 credits/Non-Dispatchable Hours	R8B		0.76%	486.571	0.76%	16.433	0.63333	2.2079	YES	767	MSS								
B.2.18.1.1	P12	LNRP Standalone/DA %	R8B (POTS)		6.00%	31.700	6.00%	32	0.00001	1.6431	YES	762	MSS								
B.2.18.1.1	P12	LNRP Standalone/DA %	R8B (POTS)		6.00%	31.700	6.00%	32	0.00001	1.6431	YES	767	MSS								
B.2.18.1.2	P12	LNRP Standalone/DA %	R8B (POTS)		0.00%	486.393	0.00%	6.499	0.00001	1.3411	YES	762	MSS								
B.2.18.1.2	P12	LNRP Standalone/DA %	R8B (POTS)		0.00%	486.393	0.00%	6.499	0.00001	1.3411	YES	767	MSS								

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Q2 19 12.1	P3	Local Interline Transport <10 credit/Dispatch/A (hours)	DB1/CS3	4.14%	2,273	0.00%	0	0.0000	0.7203	YES	767	MSS
Q2 19 13.1	P3	Loop + Port Combinations <10 credit/Dispatch/A (hours)	RAB	5.50%	31,773	6.16%	744	0.2064	21.7151	YES	767 <th>MSS</th>	MSS
Q2 19 13.1	P3	Loop + Port Combinations <10 credit/Dispatch/A (hours)	RAB	3.52%	21,773	6.16%	744	0.0602	0.7828	YES	767 <th>MSS</th>	MSS
Q2 19 13.2	P3	Loop + Port Combinations <10 credit/Dispatch/A (hours)	RAB	4.16%	468,819	3.27%	9,402	0.0201	3.2766	YES	767 <th>MSS</th>	MSS
Q2 19 13.2	P3	Loop + Port Combinations <10 credit/Dispatch/A (hours)	RAB	4.16%	468,819	3.27%	9,402	0.0602	4.2824	YES	767 <th>MSS</th>	MSS
Q2 19 13.2	P3	Loop + Port Combinations <10 credit/Dispatch/A (hours)	RAB	10.37%	184	11.17%	9	0.1187	0.1713	YES	767 <th>MSS</th>	MSS
Q2 19 13.2	P3	Loop + Port Combinations <10 credit/Dispatch/A (hours)	RAB	2.93%	184	11.17%	9	0.1187	0.1713	YES	767 <th>MSS</th>	MSS
Q2 19 13.1	P3	Loop + Port Combinations <10 credit/Dispatch/A (hours)	RAB	2.93%	11,025	3.41%	262	0.0265	3.3851	NO	767 <th>MSS</th>	MSS
Q2 19 13.1	P3	Loop + Port Combinations <10 credit/Dispatch/A (hours)	RAB	2.93%	11,025	3.41%	262	0.0664	4.1921	NO	767 <th>MSS</th>	MSS
Q2 19 13.2	P3	Loop + Port Combinations <10 credit/Dispatch/A (hours)	RAB	10.82%	462	0.00%	65	0.0417	0.3268	YES	767 <th>MSS</th>	MSS
Q2 19 13.2	P3	Loop + Port Combinations <10 credit/Dispatch/A (hours)	RAB	11.00%	462	0.00%	65	0.0417	0.3478	YES	767 <th>MSS</th>	MSS
Q2 19 13.1	P3	Loop + Port Combinations <10 credit/Dispatch/A (hours)	RAB (POT) and SB Or	5.50%	71,159	0.00%	0	0.1619	1.3126	YES	767 <th>MSS</th>	MSS
Q2 19 13.1	P3	Loop + Port Combinations <10 credit/Dispatch/A (hours)	RAB (POT) and SB Or	5.50%	71,159	0.00%	0	0.1650	0.2129	YES	767 <th>MSS</th>	MSS
Q2 19 13.1	P3	Loop + Port Combinations <10 credit/Dispatch/A (hours)	RAB - Dip	6.92%	7,779	4.31%	355	0.0177	0.1841	YES	767 <th>MSS</th>	MSS
Q2 19 13.1	P3	Loop + Port Combinations <10 credit/Dispatch/A (hours)	RAB - Dip	5.50%	7,779	0.00%	355	0.0177	0.7674	NO	767 <th>MSS</th>	MSS
Q2 19 13.2	P3	Loop + Port Combinations <10 credit/Dispatch/A (hours)	Digital Loop + DS1	3.80%	103	5.14%	103	0.0000	0.2655	YES	767 <th>MSS</th>	MSS
Q2 19 13.1	P3	Loop + Port Combinations <10 credit/Dispatch/A (hours)	Digital Loop + DS1	0.43%	103	0.74%	607	0.0000	1.3856	YES	767 <th>MSS</th>	MSS
Average Completion Notice Interval - Mechanized												
Q2 21 1.2	P3	Local Interline Transport <10 credit/Dispatch/A (hours)	RAB (POT)	1.41	347,843	74.51	5,362	0.3500	6.8328	NO	767 <th>MSS</th>	MSS
Q2 21 1.2	P3	Local Interline Transport <10 credit/Dispatch/A (hours)	RAB (POT)	1.41	347,843	74.51	5,362	0.0975	0.2220	NO	767 <th>MSS</th>	MSS
Q2 21 1.1	P3	Loop + Port Combinations <10 credit/Dispatch/A (hours)	RAB	2.75	27,425	8.70	368	0.4949	0.3350	NO	767 <th>MSS</th>	MSS
Q2 21 1.1	P3	Loop + Port Combinations <10 credit/Dispatch/A (hours)	RAB	2.81	27,425	8.92	368	0.0704	0.3350	NO	767 <th>MSS</th>	MSS
Q2 21 1.2	P3	Loop + Port Combinations <10 credit/Dispatch/A (hours)	RAB	1.42	349,474	2.88	8,891	0.0761	28.2821	NO	767 <th>MSS</th>	MSS
Q2 21 1.2	P3	Loop + Port Combinations <10 credit/Dispatch/A (hours)	RAB	1.42	349,474	2.88	8,891	0.0707	4.2210	NO	767 <th>MSS</th>	MSS
Q2 21 1.1	P3	Other Design <10 credit/Dispatch/A (hours)	RAB&D - Dip	14.88	29,391	1.00	190,043	0.0000	1.9234	NO	767 <th>MSS</th>	MSS
Q2 21 1.1	P3	Other Design <10 credit/Dispatch/A (hours)	RAB&D - Dip	16.50	29,391	1.00	190,043	0.0000	1.9234	NO	767 <th>MSS</th>	MSS
Q2 21 1.1	P3	Other Design <10 credit/Dispatch/A (hours)	RAB&D - Dip	0.21	147	0.00	104,301	0.0000	0.0000	NO	767 <th>MSS</th>	MSS
Q2 21 1.1	P3	Other Design <10 credit/Dispatch/A (hours)	RAB&D - Dip	0.21	147	0.00	104,301	0.0000	0.0000	NO	767 <th>MSS</th>	MSS
Q2 21 1.1	P3	ADSL to Retail	ADSL to Retail	7.09	10,865	21	178	0.0000	0.0000	NO	767 <th>MSS</th>	MSS
Q2 21 1.1	P3	ADSL to Retail	ADSL to Retail	0.85	455	1	124	0.0000	0.0000	NO	767 <th>MSS</th>	MSS
Q2 21 1.2	P3	ADSL to Retail	ADSL to Retail	0.85	455	1	124	0.0000	0.0000	NO	767 <th>MSS</th>	MSS
Q2 21 1.2	P3	ADSL to Retail	ADSL to Retail	0.85	455	1	124	0.0000	0.0000	NO	767 <th>MSS</th>	MSS
Q2 21 1.2	P3	ADSL to Retail	ADSL to Retail	0.08	4	0.00	0.128	0.0000	0.0000	NO	767 <th>MSS</th>	MSS
Q2 21 1.1	P3	ISDN - BRI	ISDN - BRI	17.58	381	0.00	89,184	0.0000	0.0000	NO	767 <th>MSS</th>	MSS
Q2 21 1.1	P3	ISDN - BRI	ISDN - BRI	17.58	381	0.00	89,184	0.0000	0.0000	NO	767 <th>MSS</th>	MSS
Q2 21 1.2	P3	ISDN - BRI	ISDN - BRI	2.78	615	0.00	17,775	0.0000	0.0000	NO	767 <th>MSS</th>	MSS
Q2 21 1.1	P3	ADSL to Retail	ADSL to Retail	7.09	10,865	21	178	0.0000	0.0000	NO	767 <th>MSS</th>	MSS
Q2 21 1.2	P3	ADSL to Retail	ADSL to Retail	0.85	455	1	124	0.0000	0.0000	NO	767 <th>MSS</th>	MSS
Q2 21 1.2	P3	ADSL to Retail	ADSL to Retail	0.08	4	0.00	0.128	0.0000	0.0000	NO	767 <th>MSS</th>	MSS
Q2 21 1.1	P3	Other Design <10 credit/Dispatch/A (hours)	RAB - Dip	2.75	27,425	18.06	18,099	0.0000	0.0000	NO	767 <th>MSS</th>	MSS
Q2 21 1.1	P3	Other Design <10 credit/Dispatch/A (hours)	RAB - Dip	2.81	27,425	18.29	18,099	0.0000	0.0000	NO	767 <th>MSS</th>	MSS
Q2 21 1.2	P3	Other Design <10 credit/Dispatch/A (hours)	RAB - Dip	2.75	27,425	18.06	18,099	0.0000	0.0000	NO	767 <th>MSS</th>	MSS
Q2 21 1.2	P3	Other Design <10 credit/Dispatch/A (hours)	RAB - Dip	2.81	27,425	18.29	18,099	0.0000	0.0000	NO	767 <th>MSS</th>	MSS
Q2 21 10.1	P3	Other Design <10 credit/Dispatch/A (hours)	RAB - Dip	2.75	27,425	18.06	18,099	0.0000	0.0000	NO	767 <th>MSS</th>	MSS
Q2 21 10.1	P3	Other Design <10 credit/Dispatch/A (hours)	RAB - Dip	2.81	27,425	18.29	18,099	0.0000	0.0000	NO	767 <th>MSS</th>	MSS
Q2 21 10.2	P3	Other Design <10 credit/Dispatch/A (hours)	RAB - Dip	2.75	27,425	18.06	18,099	0.0000	0.0000	NO	767 <th>MSS</th>	MSS
Q2 21 10.2	P3	Other Design <10 credit/Dispatch/A (hours)	RAB - Dip	2.81	27,425	18.29	18,099	0.0000	0.0000	NO	767 <th>MSS</th>	MSS
Q2 21 10.1	P3	Other Design <10 credit/Dispatch/A (hours)	RAB - Dip	2.75	27,425	18.06	18,099	0.0000	0.0000	NO	767 <th>MSS</th>	MSS
Q2 21 10.1	P3	Other Design <10 credit/Dispatch/A (hours)	RAB - Dip	2.81	27,425	18.29	18,099	0.0000	0.0000	NO	767 <th>MSS</th>	MSS
Q2 21 11.2	P3	Other Design <10 credit/Dispatch/A (hours)	RAB - Dip	2.75	27,425	18.06	18,099	0.0000	0.0000	NO	767 <th>MSS</th>	MSS
Q2 21 11.2	P3	Other Design <10 credit/Dispatch/A (hours)	RAB - Dip	2.81	27,425	18.29	18,099	0.0000	0.0000	NO	767 <th>MSS</th>	MSS
Q2 21 14.1	P3	Other Design <10 credit/Dispatch/A (hours)	Design	144.55	1,522	0.00	633,560	0.0000	0.0000	NO	767 <th>MSS</th>	MSS
Q2 21 14.1	P3	Other Design <10 credit/Dispatch/A (hours)	Design	147.30	1,524	0.00	633,560	0.0000	0.0000	NO	767 <th>MSS</th>	MSS
Q2 21 14.2	P3	Other Design <10 credit/Dispatch/A (hours)	Design	69.69	29	0.00	192,844	0.0000	0.0000	NO	767 <th>MSS</th>	MSS
Q2 21 14.2	P3	Other Design <10 credit/Dispatch/A (hours)	Design	74.61	29	0.00	192,844	0.0000	0.0000	NO	767 <th>MSS</th>	MSS
Q2 21 14.2	P3	Other Design <10 credit/Dispatch/A (hours)	Design	141.09	29	0.00	173,448	0.0000	0.0000	NO	767 <th>MSS</th>	MSS
Q2 21 14.2	P3	Other Design <10 credit/Dispatch/A (hours)	Design	150.55	31	0.00	173,448	0.0000	0.0000	NO	767 <th>MSS</th>	MSS
Q2 21 18.1	P3	Other Non-Design <10 credit/Dispatch/A (hours)	RAB	2.75	27,425	18.06	18,099	0.0000	0.0000	NO	767 <th>MSS</th>	MSS
Q2 21 18.1	P3	Other Non-Design <10 credit/Dispatch/A (hours)	RAB	2.81	27,425	18.29	18,099	0.0000	0.0000	NO	767 <th>MSS</th>	MSS
Q2 21 18.2	P3	Other Non-Design <10 credit/Dispatch/A (hours)	RAB	1.42	349,744	2.88	8,891	0.0000	0.0000	NO	767 <th>MSS</th>	MSS
Q2 21 18.2	P3	Other Non-Design <10 credit/Dispatch/A (hours)	RAB	1.42	349,744	2.88	8,891	0.0000	0.0000	NO	767 <th>MSS</th>	MSS
Q2 21 18.2	P3	Other Non-Design <10 credit/Dispatch/A (hours)	RAB (POT)	1.41	347,843	74.51	5,362	0.0000	0.0000	NO	767 <th>MSS</th>	MSS
Q2 21 18.2	P3	Other Non-Design <10 credit/Dispatch/A (hours)	RAB (POT)	1.41	347,843	74.51	5,362	0.0975	0.2220	NO	767 <th>MSS</th>	MSS
Q2 21 18.1	P3	Digital Loop + DS1	Digital Loop + DS1	119.93	270	0.00	200,170	0.0000	0.0000	NO	767 <th>MSS</th>	MSS
Q2 21 18.1	P3	Digital Loop + DS1	Digital Loop + DS1	205.08	2	0.00	291,079	0.0000	0.0000	NO	767 <th>MSS</th>	MSS
Q2 21 18.1	P3	Digital Loop + DS1	Digital Loop + DS1	63.78	36	0.00	119,210	0.0000	0.0000	NO	767 <th>MSS</th>	MSS
Q2 21 18.1	P3	Digital Loop + DS1	Digital Loop + DS1	207.99	3	0.00	291,079	0.0000	0.0000	NO	767 <th>MSS</th>	MSS
Average Completion Notice Interval - Non-Mechanized												
Q2 22 2.1	P3	Local Interline Transport <10 credit/Dispatch/A (hours)	Diagnostic	15.81	2	0.00	0.0000	0.0000	0.0000	NO	767 <th>MSS</th>	MSS
Q2 22 2.1	P3	Local Interline Transport <10 credit/Dispatch/A (hours)	Diagnostic	15.81	2	0.00	0.0000	0.0000	0.0000	NO	767 <th>MSS</th>	MSS
Q2 22 2.1	P3	Local Interline Transport <10 credit/Dispatch/A (hours)	Diagnostic	15.81	2	0.00	0.0000	0.0000	0.0000	NO	767 <th>MSS</th>	MSS
Q2 22 2.2	P3	Local Interline Transport <10 credit/Dispatch/A (hours)	Diagnostic	15.81	2	0.00	0.0000	0.0000	0.0000	NO	767 <th>MSS</th>	MSS
Q2 22 2.2	P3	Local Interline Transport <10 credit/Dispatch/A (hours)	Diagnostic	15.81	2	0.00	0.0000	0.0000	0.0000	NO	767 <th>MSS</th>	MSS
Q2 22 2.2	P3	Local Interline Transport <10 credit/Dispatch/A (hours)	Diagnostic	15.81	2	0.00	0.0000	0.0000	0.0000	NO	767 <th>MSS</th>	MSS
Q2 22 2.1	P3	Loop + Port Combinations <10 credit/Dispatch/A (hours)	Diagnostic	15.81	2	0.00	0.0000	0.0000	0.0000	NO	767 <th>MSS</th>	MSS

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		Benchmark/ Analog	BST Measure	BST Volume	CLEC Measure	CLEC Volume	Standard Deviation	Standard Error	Standard Z-Score	Equity	
A1133	C-9	Design (Specialist/GA) (%)									
A1134	C-9	Design (GA) (%)									
A1135	C-9	Customer (GA) (%)									
A1136	C-9	SONGA (%)									
A1102	FCC Timeliness - Family Mechanized										
A1103	C-9	Redesign (GA) (%)									
A1104	C-9	Design (Specialist/GA) (%)									
A1105	C-9	Design (GA) (%)									
A1106	C-9	SONGA (%)									
A1111	FCC Timeliness - Partially Mechanized - 18 Hours										
A1112	C-9	Redesign (GA) (%)									
A1113	C-9	Design (Specialist/GA) (%)									
A1114	C-9	Design (GA) (%)									
A1116	C-9	SONGA (%)									
A1131	FCC Timeliness - Non-Mechanized										
A1132	C-9	Redesign (GA) (%)									
A1133	C-9	Design (Specialist/GA) (%)									
A1134	C-9	Design (GA) (%)									
A1135	C-9	SONGA (%)									
A1141	FCC & Reply Response Completeness - Mechanized										
A1142	C-11	Redesign (GA) (%)									
A1143	C-11	Design (Specialist/GA) (%)									
A1144	C-11	Design (GA) (%)									
A1145	C-11	Customer (GA) (%)									
A1146	C-11	SONGA (%)									
A1151	FCC & Reply Response Completeness - Partially Mechanized										
A1152	C-11	Redesign (GA) (%)									
A1153	C-11	Design (Specialist/GA) (%)									
A1154	C-11	Design (GA) (%)									
A1155	C-11	Customer (GA) (%)									
A1156	C-11	SONGA (%)									
A1161	FCC & Reply Response Completeness - Non-Mechanized										
A1162	C-11	Redesign (GA) (%)									
A1163	C-11	Design (Specialist/GA) (%)									
A1164	C-11	Design (GA) (%)									
A1165	C-11	Customer (GA) (%)									
A1166	C-11	SONGA (%)									
A1171	FCC & Reply Response Completeness (Multiple Responses) - Mechanized										
A1172	C-11	Redesign (GA) (%)									
A1173	C-11	Design (Specialist/GA) (%)									
A1174	C-11	Design (GA) (%)									
A1175	C-11	Customer (GA) (%)									
A1176	C-11	SONGA (%)									
A1181	FCC & Reply Response Completeness (Multiple Responses) - Partially Mechanized										
A1182	C-11	Redesign (GA) (%)									
A1183	C-11	Design (Specialist/GA) (%)									
A1184	C-11	Design (GA) (%)									
A1185	C-11	Customer (GA) (%)									
A1186	C-11	SONGA (%)									

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Item	Measure	Value	Target	Unit
A.1.183	Plan (Specialty)CA (%)	97.45%	98%	NO
A.1.184	Plan (CA) (%)	92.31%	95%	YES
A.1.185	Plan (Specialty)CA (%)	91.7%	95%	YES
A.1.186	Plan (CA) (%)	87.14%	95%	YES
A.1.187	Plan (Specialty)CA (%)	95.02%	95%	YES

Benchmark /
Analysis

Item	Measure	Value	Target	Unit	Standard Deviation	Standard Error	Z-Score	Equity
A.1.183	Plan (Specialty)CA (%)	97.45%	98%	NO				
A.1.184	Plan (CA) (%)	92.31%	95%	YES				
A.1.185	Plan (Specialty)CA (%)	91.7%	95%	YES				
A.1.186	Plan (CA) (%)	87.14%	95%	YES				
A.1.187	Plan (Specialty)CA (%)	95.02%	95%	YES				

FOC & Patient Responsiveness (Multiple Responses) - Non-Debarred

Item	Measure	Value	Target	Unit
A.1.188	Response CA (%)	95%	95%	YES
A.1.189	Plan (Specialty)CA (%)	95%	95%	YES
A.1.190	Plan (CA) (%)	95%	95%	YES
A.1.191	Plan (Specialty)CA (%)	95%	95%	YES

Benchmark /
Analysis

Item	Measure	Value	Target	Unit	Standard Deviation	Standard Error	Z-Score	Equity
A.1.188	Response CA (%)	95%	95%	YES				
A.1.189	Plan (Specialty)CA (%)	95%	95%	YES				
A.1.190	Plan (CA) (%)	95%	95%	YES				
A.1.191	Plan (Specialty)CA (%)	95%	95%	YES				

Rate - Provisioning

Item	Measure	Value	Target	Unit
A.2.1.11	Response CA (%)	95%	95%	YES
A.2.1.12	Plan (Specialty)CA (%)	95%	95%	YES
A.2.1.13	Plan (CA) (%)	95%	95%	YES
A.2.1.14	Plan (Specialty)CA (%)	95%	95%	YES

Benchmark /
Analysis

Item	Measure	Value	Target	Unit	Standard Deviation	Standard Error	Z-Score	Equity
A.2.1.11	Response CA (%)	95%	95%	YES				
A.2.1.12	Plan (Specialty)CA (%)	95%	95%	YES				
A.2.1.13	Plan (CA) (%)	95%	95%	YES				
A.2.1.14	Plan (Specialty)CA (%)	95%	95%	YES				

Rate - Compliance

Item	Measure	Value	Target	Unit
A.2.1.15	Response CA (%)	95%	95%	YES
A.2.1.16	Plan (Specialty)CA (%)	95%	95%	YES
A.2.1.17	Plan (CA) (%)	95%	95%	YES
A.2.1.18	Plan (Specialty)CA (%)	95%	95%	YES

Benchmark /
Analysis

Item	Measure	Value	Target	Unit	Standard Deviation	Standard Error	Z-Score	Equity
A.2.1.15	Response CA (%)	95%	95%	YES				
A.2.1.16	Plan (Specialty)CA (%)	95%	95%	YES				
A.2.1.17	Plan (CA) (%)	95%	95%	YES				
A.2.1.18	Plan (Specialty)CA (%)	95%	95%	YES				

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Account	Measure	Value	Target	Delta	Diagnosis
A.223.1.1	Design (Specialty) <= 10 credits/Department (days)	15.11	9	6.21	Diagnostic
A.223.1.2	Design (Specialty) <= 10 credits/Non-Department (days)	9.75	4	5.75	Diagnostic
A.223.1.2	Design (Specialty) >= 10 credits/Non-Department (days)	30.00	1	29.00	Diagnostic
A.223.1.2	Design (Specialty) >= 10 credits/Department (days)	4.50	4	0.50	Diagnostic
A.223.1.2	PRX <= 10 credits/Non-Department (days)	7.00	1	6.00	Diagnostic
A.223.1.2	PRX <= 10 credits/Department (days)	15.00	5	10.00	Diagnostic
A.223.1.2	Center <= 10 credits/Non-Department (days)	8.31	18	-9.69	Diagnostic
A.223.1.2	Center <= 10 credits/Department (days)	13.67	3	10.67	Diagnostic
A.223.1.2	Center >= 10 credits/Non-Department (days)	8.50	2	6.50	Diagnostic
A.223.1.2	Center >= 10 credits/Department (days)	15.50	6	9.50	Diagnostic
A.223.1.2	SDN <= 10 credits/Non-Department (days)				Diagnostic
A.223.1.2	SDN <= 10 credits/Department (days)				Diagnostic

% Completion with Notice in < 24 Hours

Account	Measure	Value	Target	Delta	Diagnosis
A.224.1.1	Reschedule/Department (GA) (%)	100.00%	1,203	-1,197	Diagnostic
A.224.1.2	Reschedule/Non-Department (GA) (%)	100.00%	71,388	-71,387	Diagnostic
A.224.1.1	Reschedule/Department (VA) (%)	100.00%	160	-159	Diagnostic
A.224.1.1	Reschedule/Non-Department (VA) (%)	100.00%	14	-13	Diagnostic
A.224.1.1	Design (Specialty)/Department (GA) (%)	100.00%	4	-3	Diagnostic
A.224.1.1	Design (Specialty)/Non-Department (GA) (%)	100.00%	22	-21	Diagnostic
A.224.1.1	Center/Department (GA) (%)	100.00%	9	-8	Diagnostic
A.224.1.1	Center/Non-Department (GA) (%)	100.00%	54	-53	Diagnostic
A.224.1.1	SDN/Department (GA) (%)	100.00%	9	-8	Diagnostic
A.224.1.1	SDN/Non-Department (GA) (%)	100.00%	11	-10	Diagnostic

Open < Order Accuracy

Account	Measure	Value	Target	Delta	Diagnosis
A.225.1.1	Reschedule <= 10 credits/Non-Department (GA) (%)	90.63%	180	-89.37	NO
A.225.1.2	Reschedule <= 10 credits/Department (GA) (%)	87.65%	6	-86.35	NO
A.225.1.2	Reschedule >= 10 credits/Non-Department (GA) (%)	86.14%	101	-85.14	NO
A.225.1.2	Reschedule >= 10 credits/Department (GA) (%)	100.00%	2	-99.00	YES
A.225.1.2	Design (Specialty) <= 10 credits/Non-Department (GA) (%)	87.73%	7	-86.73	NO
A.225.1.2	Design (Specialty) <= 10 credits/Department (GA) (%)	95.9%	9	-94.9%	NO

Result Maintenance and Result

Account	Measure	Value	Target	Delta	Diagnosis
A.311.1	Reschedule/Department (GA) (%)	1.52%	759	-757.48	YES
A.311.2	Reschedule/Non-Department (GA) (%)	8.73%	357	-348.27	YES
A.312.1	Reschedule/Department (VA) (%)	3.43%	207	-203.57	YES
A.312.2	Reschedule/Non-Department (VA) (%)	1.42%	14	-12.58	YES
A.313.1	Design (Specialty)/Department (GA) (%)	0.49%	57	-56.51	YES
A.313.2	Design (Specialty)/Non-Department (GA) (%)	14.61%	6	10.61%	YES
A.314.1	PRX/Department (GA) (%)	2.98%	3	-0.02%	YES
A.314.2	PRX/Non-Department (GA) (%)	1.07%	15	-13.93%	YES
A.315.1	Center/Department (GA) (%)	5.24%	15	-9.76%	YES
A.315.2	Center/Non-Department (GA) (%)	1.33%	6	-4.67%	YES
A.316.1	SDN/Department (GA) (%)	506	3	503.00%	NO
A.316.2	SDN/Non-Department (GA) (%)	33,33%		-2,3174	NO

Customer Trouble Report Rate

Benchmark /
Measure

Account	Measure	Value	Target	Delta	Standard Deviation	Standard Error	ZScore	Equity
A.223.1.1	Design (Specialty) <= 10 credits/Department (days)	15.11	9	6.21				Diagnostic
A.223.1.2	Design (Specialty) <= 10 credits/Non-Department (days)	9.75	4	5.75				Diagnostic
A.223.1.2	Design (Specialty) >= 10 credits/Non-Department (days)	30.00	1	29.00				Diagnostic
A.223.1.2	Design (Specialty) >= 10 credits/Department (days)	4.50	4	0.50				Diagnostic
A.223.1.2	PRX <= 10 credits/Non-Department (days)	7.00	1	6.00				Diagnostic
A.223.1.2	PRX <= 10 credits/Department (days)	15.00	5	10.00				Diagnostic
A.223.1.2	Center <= 10 credits/Non-Department (days)	8.31	18	-9.69				Diagnostic
A.223.1.2	Center <= 10 credits/Department (days)	13.67	3	10.67				Diagnostic
A.223.1.2	Center >= 10 credits/Non-Department (days)	8.50	2	6.50				Diagnostic
A.223.1.2	Center >= 10 credits/Department (days)	15.50	6	9.50				Diagnostic
A.223.1.2	SDN <= 10 credits/Non-Department (days)							Diagnostic
A.223.1.2	SDN <= 10 credits/Department (days)							Diagnostic

Account	Measure	Value	Target	Delta	Standard Deviation	Standard Error	ZScore	Equity
A.224.1.1	Reschedule/Department (GA) (%)	100.00%	1,203	-1,197				Diagnostic
A.224.1.2	Reschedule/Non-Department (GA) (%)	100.00%	71,388	-71,387				Diagnostic
A.224.1.1	Reschedule/Department (VA) (%)	100.00%	160	-159				Diagnostic
A.224.1.1	Reschedule/Non-Department (VA) (%)	100.00%	14	-13				Diagnostic
A.224.1.1	Design (Specialty)/Department (GA) (%)	100.00%	4	-3				Diagnostic
A.224.1.1	Design (Specialty)/Non-Department (GA) (%)	100.00%	22	-21				Diagnostic
A.224.1.1	Center/Department (GA) (%)	100.00%	9	-8				Diagnostic
A.224.1.1	Center/Non-Department (GA) (%)	100.00%	54	-53				Diagnostic
A.224.1.1	SDN/Department (GA) (%)	100.00%	9	-8				Diagnostic
A.224.1.1	SDN/Non-Department (GA) (%)	100.00%	11	-10				Diagnostic

Account	Measure	Value	Target	Delta	Standard Deviation	Standard Error	ZScore	Equity
A.225.1.1	Reschedule <= 10 credits/Non-Department (GA) (%)	90.63%	180	-89.37				NO
A.225.1.2	Reschedule <= 10 credits/Department (GA) (%)	87.65%	6	-86.35				NO
A.225.1.2	Reschedule >= 10 credits/Non-Department (GA) (%)	86.14%	101	-85.14				NO
A.225.1.2	Reschedule >= 10 credits/Department (GA) (%)	100.00%	2	-99.00				YES
A.225.1.2	Design (Specialty) <= 10 credits/Non-Department (GA) (%)	87.73%	7	-86.73				NO
A.225.1.2	Design (Specialty) <= 10 credits/Department (GA) (%)	95.9%	9	-94.9%				NO

Account	Measure	Value	Target	Delta	Standard Deviation	Standard Error	ZScore	Equity
A.311.1	Reschedule/Department (GA) (%)	1.52%	759	-757.48				YES
A.311.2	Reschedule/Non-Department (GA) (%)	8.73%	357	-348.27				YES
A.312.1	Reschedule/Department (VA) (%)	3.43%	207	-203.57				YES
A.312.2	Reschedule/Non-Department (VA) (%)	1.42%	14	-12.58				YES
A.313.1	Design (Specialty)/Department (GA) (%)	0.49%	57	-56.51				YES
A.313.2	Design (Specialty)/Non-Department (GA) (%)	14.61%	6	10.61%				YES
A.314.1	PRX/Department (GA) (%)	2.98%	3	-0.02%				YES
A.314.2	PRX/Non-Department (GA) (%)	1.07%	15	-13.93%				YES
A.315.1	Center/Department (GA) (%)	5.24%	15	-9.76%				YES
A.315.2	Center/Non-Department (GA) (%)	1.33%	6	-4.67%				YES
A.316.1	SDN/Department (GA) (%)	506	3	503.00%				NO
A.316.2	SDN/Non-Department (GA) (%)	33,33%		-2,3174				NO

Georgia, May 2001
Beilstone County Monthly State Summary

Analysis/	BST	BST	CLEC	CLEC	Volume	Standard Error	ZScore	Equity
MAR-2 (Residential-Dependent (%))	2.58%	2,189,738	2.33%	88,888	0.00055	4.7109	YES	A.3.2.11
MAR-2 (Business-Dependent (%))	1.78%	2,789,758	0.85%	89,885	0.00046	2.1937	YES	A.3.2.12
MAR-2 (Business-Non-Dependent (%))	1.50%	768,278	1.65%	21,643	0.00064	-1.8328	NO	A.3.2.21
MAR-2 (Design (Special)-Dependent (%))	0.93%	788,278	0.95%	21,643	0.00066	-0.1195	YES	A.3.2.22
MAR-2 (Design (Special)-Non-Dependent (%))	0.29%	673,379	0.76%	9,794	0.00054	-8.6263	NO	A.3.2.23
MAR-2 (PBX)-Dependent (%))	0.42%	673,379	0.65%	9,794	0.00066	-2.9978	NO	A.3.2.41
MAR-2 (PBX)-Non-Dependent (%))	0.15%	1,175,177	0.25%	2,385	0.00090	-1.2927	YES	A.3.2.42
MAR-2 (Fiber)-Dependent (%))	0.14%	1,175,177	0.13%	2,385	0.00078	0.2181	YES	A.3.2.43
MAR-2 (Central-Dependent (%))	0.96%	369,896	0.60%	5,510	0.00103	-0.3842	YES	A.3.2.51
MAR-2 (Central-Non-Dependent (%))	0.37%	659,886	0.71%	5,210	0.00101	1.1939	YES	A.3.2.52
MAR-2 (ISDN)-Dependent (%))	3.22%	659,886	2.12%	383	0.01071	1.0258	YES	A.3.2.61
MAR-2 (ISDN)-Non-Dependent (%))	3.48%	15,690	1.08%	283	0.01119	2.1628	YES	A.3.2.62

Maintenance Average Duration	MAR-3 (Residential-Dependent (hours))	MAR-3 (Residential-Non-Dependent (hours))	MAR-3 (Business-Dependent (hours))	MAR-3 (Design (Special)-Dependent (hours))	MAR-3 (Design (Special)-Non-Dependent (hours))	MAR-3 (PBX)-Dependent (hours)	MAR-3 (PBX)-Non-Dependent (hours)	MAR-3 (Central-Dependent (hours))	MAR-3 (Central-Non-Dependent (hours))	MAR-3 (ISDN)-Dependent (hours)	MAR-3 (ISDN)-Non-Dependent (hours)	
A.3.3.11	21.47	17.652	15.42	2,058	23.721	0.52946	16,7068	YES	A.3.3.12	0.1497	0.6411	YES
A.3.3.12	9.30	49,233	4.39	759	13,531	0.49499	9,3329	YES	A.3.3.21	0.01965	0.3684	YES
A.3.3.21	9.30	49,233	4.39	759	13,531	0.49499	9,3329	YES	A.3.3.22	0.02849	-0.3640	NO
A.3.3.22	18.46%	11,496	17.93%	357	0.02728	0.2136	YES	A.3.3.41	0.05209	0.3640	YES	
A.3.3.41	18.46%	11,496	17.93%	357	0.02728	0.2136	YES	A.3.3.42	0.02023	0.6817	YES	
A.3.3.42	23.03%	179	0.00%	0	0.17177	1.3189	YES	A.3.3.43	0.08303	0.8165	YES	
A.3.3.43	18.66%	2,015	24.24%	33	0.08303	0.8165	YES	A.3.3.51	0.08303	0.8165	YES	
A.3.3.51	18.66%	2,015	24.24%	33	0.08303	0.8165	YES	A.3.3.52	0.08303	0.8165	YES	
A.3.3.52	18.66%	2,015	24.24%	33	0.08303	0.8165	YES	A.3.3.61	0.08303	0.8165	YES	
A.3.3.61	32.05%	546	33.33%	3	0.07017	-0.6475	YES	A.3.3.62	0.07017	-0.6475	YES	
A.3.3.62	32.05%	546	33.33%	3	0.07017	-0.6475	YES	A.3.3.71	0.07017	-0.6475	YES	

% Report Troubles within 30 Days	MAR-4 (Residential-Dependent (%))	MAR-4 (Residential-Non-Dependent (%))	MAR-4 (Business-Dependent (%))	MAR-4 (Design (Special)-Dependent (%))	MAR-4 (Design (Special)-Non-Dependent (%))	MAR-4 (PBX)-Dependent (%))	MAR-4 (PBX)-Non-Dependent (%))	MAR-4 (Central-Dependent (%))	MAR-4 (Central-Non-Dependent (%))	MAR-4 (ISDN)-Dependent (%))	MAR-4 (ISDN)-Non-Dependent (%))
A.3.4.11	82.11%	17,652	17.62%	2,058	0.01965	0.3684	YES	A.3.4.12	0.01965	0.6411	YES
A.3.4.12	21.20%	49,233	22.27%	759	0.01965	0.6411	YES	A.3.4.21	0.01965	0.6411	YES
A.3.4.21	21.20%	49,233	22.27%	759	0.01965	0.6411	YES	A.3.4.22	0.01965	0.6411	YES
A.3.4.22	18.46%	11,496	17.93%	357	0.02728	0.2136	YES	A.3.4.31	0.02728	0.2136	YES
A.3.4.31	18.46%	11,496	17.93%	357	0.02728	0.2136	YES	A.3.4.32	0.02728	0.2136	YES
A.3.4.32	18.46%	11,496	17.93%	357	0.02728	0.2136	YES	A.3.4.41	0.02728	0.2136	YES
A.3.4.41	18.46%	11,496	17.93%	357	0.02728	0.2136	YES	A.3.4.42	0.02728	0.2136	YES
A.3.4.42	18.46%	11,496	17.93%	357	0.02728	0.2136	YES	A.3.4.51	0.02728	0.2136	YES
A.3.4.51	18.46%	11,496	17.93%	357	0.02728	0.2136	YES	A.3.4.52	0.02728	0.2136	YES
A.3.4.52	18.46%	11,496	17.93%	357	0.02728	0.2136	YES	A.3.4.61	0.02728	0.2136	YES
A.3.4.61	18.46%	11,496	17.93%	357	0.02728	0.2136	YES	A.3.4.62	0.02728	0.2136	YES
A.3.4.62	18.46%	11,496	17.93%	357	0.02728	0.2136	YES	A.3.4.71	0.02728	0.2136	YES
A.3.4.71	18.46%	11,496	17.93%	357	0.02728	0.2136	YES	A.3.4.72	0.02728	0.2136	YES
A.3.4.72	18.46%	11,496	17.93%	357	0.02728	0.2136	YES	A.3.4.81	0.02728	0.2136	YES
A.3.4.81	18.46%	11,496	17.93%	357	0.02728	0.2136	YES	A.3.4.82	0.02728	0.2136	YES
A.3.4.82	18.46%	11,496	17.93%	357	0.02728	0.2136	YES	A.3.4.91	0.02728	0.2136	YES
A.3.4.91	18.46%	11,496	17.93%	357	0.02728	0.2136	YES	A.3.4.92	0.02728	0.2136	YES
A.3.4.92	18.46%	11,496	17.93%	357	0.02728	0.2136	YES	A.3.4.93	0.02728	0.2136	YES

Out of Service > 24 hours	MAR-5 (Residential-Dependent (%))	MAR-5 (Residential-Non-Dependent (%))	MAR-5 (Business-Dependent (%))	MAR-5 (Design (Special)-Dependent (%))	MAR-5 (Design (Special)-Non-Dependent (%))	MAR-5 (PBX)-Dependent (%))	MAR-5 (PBX)-Non-Dependent (%))	MAR-5 (Central-Dependent (%))	MAR-5 (Central-Non-Dependent (%))	MAR-5 (ISDN)-Dependent (%))	MAR-5 (ISDN)-Non-Dependent (%))
A.3.5.11	31.75%	47,742	14.43%	1,504	0.01219	-1.2117	YES	A.3.5.12	0.01219	-1.2117	YES
A.3.5.12	31.75%	47,742	14.43%	1,504	0.01219	-1.2117	YES	A.3.5.21	0.01219	-1.2117	YES
A.3.5.21	31.75%	47,742	14.43%	1,504	0.01219	-1.2117	YES	A.3.5.22	0.01219	-1.2117	YES
A.3.5.22	31.75%	47,742	14.43%	1,504	0.01219	-1.2117	YES	A.3.5.31	0.01219	-1.2117	YES
A.3.5.31	31.75%	47,742	14.43%	1,504	0.01219	-1.2117	YES	A.3.5.32	0.01219	-1.2117	YES
A.3.5.32	31.75%	47,742	14.43%	1,504	0.01219	-1.2117	YES	A.3.5.41	0.01219	-1.2117	YES
A.3.5.41	31.75%	47,742	14.43%	1,504	0.01219	-1.2117	YES	A.3.5.42	0.01219	-1.2117	YES
A.3.5.42	31.75%	47,742	14.43%	1,504	0.01219	-1.2117	YES	A.3.5.51	0.01219	-1.2117	YES
A.3.5.51	31.75%	47,742	14.43%	1,504	0.01219	-1.2117	YES	A.3.5.52	0.01219	-1.2117	YES
A.3.5.52	31.75%	47,742	14.43%	1,504	0.01219	-1.2117	YES	A.3.5.61	0.01219	-1.2117	YES
A.3.5.61	31.75%	47,742	14.43%	1,504	0.01219	-1.2117	YES	A.3.5.62	0.01219	-1.2117	YES
A.3.5.62	31.75%	47,742	14.43%	1,504	0.01219	-1.2117	YES	A.3.5.71	0.01219	-1.2117	YES
A.3.5.71	31.75%	47,742	14.43%	1,504	0.01219	-1.2117	YES	A.3.5.72	0.01219	-1.2117	YES
A.3.5.72	31.75%	47,742	14.43%	1,504	0.01219	-1.2117	YES	A.3.5.81	0.01219	-1.2117	YES
A.3.5.81	31.75%	47,742	14.43%	1,504	0.01219	-1.2117	YES	A.3.5.82	0.01219	-1.2117	YES
A.3.5.82	31.75%	47,742	14.43%	1,504	0.01219	-1.2117	YES	A.3.5.91	0.01219	-1.2117	YES
A.3.5.91	31.75%	47,742	14.43%	1,504	0.01219	-1.2117	YES	A.3.5.92	0.01219	-1.2117	YES
A.3.5.92	31.75%	47,742	14.43%	1,504	0.01219	-1.2117	YES	A.3.5.93	0.01219	-1.2117	YES

Basic Accuracy	BST - CA (%)	BST - S-Mile	Mean Time to Order Invoiced - CRIS	BST - Region			
A.4.1.1	97.29%	\$368,051,310	99.75%	\$6,534,318	0.00006	-383,3345	YES
A.4.1.2	97.29%	\$368,051,310	99.75%	\$6,534,318	0.00006	-383,3345	YES
A.4.2	3.66	1	3.33	1,172			YES

Bellsouth Monthly State Summary Georgia, May 2007

Unbundled Network Elements - Oidding

% Deflected Service Requests - Mechanized	
B-11.1	Switch Forward GA (%)
B-11.2	Local Interface Transferred GA (%)
B-11.3	Loop + Port Configuration GA (%)
B-11.4	Local Interface HES and UCLUGA (%)
B-11.5	KDSL (ASL, HES, and UCLUGA (%)
B-11.6	ISDN Loop (UDN, UCLUGA (%)
B-11.7	ISDN Loop (UDN, UCLUGA (%)
B-11.8	Loop Separation GA (%)
B-11.9	Loop Separation Non-Degrada (%)
B-11.10	ZV Analyst Loop withP Degrada (%)
B-11.11	ZV Analyst Loop withP Non-Degrada (%)
B-11.12	ZV Analyst Loop withP Non-Degrada (%)
B-11.13	ZV Analyst Loop withP Non-Degrada (%)
B-11.14	ZV Analyst Loop withP Non-Degrada (%)
B-11.15	Other Degrada (%)
B-11.16	Other Non-Degrada (%)
B-11.17	LTP Separation GA (%)

% Deflected Service Requests - Partially Mechanized	
C-1	Switch Forward GA (%)
C-2	Local Interface Transferred GA (%)
C-3	Loop + Port Configuration GA (%)
C-4	KDSL (ASL, HES, and UCLUGA (%)
C-5	ISDN Loop (UDN, UCLUGA (%)
C-6	ISDN Loop (UDN, UCLUGA (%)
C-7	Loop Separation GA (%)
C-8	Loop Separation Non-Degrada (%)
C-9	ZV Analyst Loop withP Degrada (%)
C-10	ZV Analyst Loop withP Non-Degrada (%)
C-11	ZV Analyst Loop withP Non-Degrada (%)
C-12	ZV Analyst Loop withP Non-Degrada (%)
C-13	ZV Analyst Loop withP Non-Degrada (%)
C-14	Other Degrada (%)
C-15	Other Non-Degrada (%)
C-16	LTP Separation GA (%)

% Deflected Service Requests - Non-Mechanized	
D-1	Switch Forward GA (%)
D-2	Local Interface Transferred GA (%)
D-3	Loop + Port Configuration GA (%)
D-4	KDSL (ASL, HES, and UCLUGA (%)
D-5	ISDN Loop (UDN, UCLUGA (%)
D-6	ISDN Loop (UDN, UCLUGA (%)
D-7	Loop Separation GA (%)
D-8	Loop Separation Non-Degrada (%)
D-9	ZV Analyst Loop withP Degrada (%)
D-10	ZV Analyst Loop withP Non-Degrada (%)
D-11	ZV Analyst Loop withP Non-Degrada (%)
D-12	ZV Analyst Loop withP Non-Degrada (%)
D-13	ZV Analyst Loop withP Non-Degrada (%)
D-14	Other Degrada (%)
D-15	Other Non-Degrada (%)
D-16	LTP Separation GA (%)
D-17	LTP Separation Non-Degrada (%)

Benchmark / Measure	BST Measure	BST Volume	CLEC Measure	CLEC Volume	Standard Deviation	Standard Error	ZScore	Equity
Degrade	61.4%	13	Degrade	61.4%				Degrade
Other	18.20%	17,687	Other	18.20%				Other
Degrade	15.95%	231	Degrade	15.95%				Degrade
Other	66.67%	3	Other	66.67%				Other
Degrade	60.25%	155	Degrade	60.25%				Degrade
Other	48.27%	35	Other	48.27%				Other
Degrade	74.4%	45	Degrade	74.4%				Degrade
Other	62.50%	16	Other	62.50%				Other
Degrade	18.25%	17,687	Degrade	18.25%				Degrade
Other	50.00%	2	Other	50.00%				Other
Degrade	24.7%	2,247	Degrade	24.7%				Degrade
Other	24.07%	25	Other	24.07%				Other
Degrade	42.47%	6,024	Degrade	42.47%				Degrade
Other	0.00%	3	Other	0.00%				Other
Degrade	29.32%	263	Degrade	29.32%				Degrade
Other	42.63%	3	Other	42.63%				Other
Degrade	19.71%	143	Degrade	19.71%				Degrade
Other	27.41%	36	Other	27.41%				Other
Degrade	21.43%	29	Degrade	21.43%				Degrade
Other	42.2%	6,044	Other	42.2%				Other
Degrade	38.77%	1,418	Degrade	38.77%				Degrade
Other	8.70%	161	Other	8.70%				Other
Degrade	37.59%	1,144	Degrade	37.59%				Degrade
Other	16.55%	652	Other	16.55%				Other
Degrade	1.09%	215	Degrade	1.09%				Degrade
Other	22.53%	127	Other	22.53%				Other
Degrade	26.77%	2,066	Degrade	26.77%				Degrade
Other	100.00%	7	Other	100.00%				Other
Degrade	33.33%	1	Degrade	33.33%				Degrade
Other	3.9%	436	Other	3.9%				Other
Degrade	37.59%	1,144	Degrade	37.59%				Degrade
Other	23.21%	655	Other	23.21%				Other
Degrade	21.79%	1,059	Degrade	21.79%				Degrade

Diff/Standard Dev. of 1.20%

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B1.15.9	B1.15.9	32.85%
B1.15.10	ZV Analog Loop w/Non-DistinctGA (%)	>= 85%
B1.15.11	ZV Analog Loop w/Non-DistinctGA (%)	>= 85%
B1.15.12	ZV Analog Loop w/Non-DistinctGA (%)	>= 85%
B1.15.13	ZV Analog Loop w/Non-DistinctGA (%)	>= 85%
B1.15.14	ZV Analog Loop w/Non-DistinctGA (%)	>= 85%
B1.15.15	ZV Analog Loop w/Non-DistinctGA (%)	>= 85%
B1.15.16	ZV Analog Loop w/Non-DistinctGA (%)	>= 85%
B1.15.17	ZV Analog Loop w/Non-DistinctGA (%)	>= 85%

FOC & Fiber Response Completeness - Non-Mechanized

B1.16.2	B1.16.2	28.85%
B1.16.3	Local Inquiries w/Non-DistinctGA (%)	>= 85%
B1.16.4	Local Inquiries w/Non-DistinctGA (%)	>= 85%
B1.16.5	Local Inquiries w/Non-DistinctGA (%)	>= 85%
B1.16.6	Local Inquiries w/Non-DistinctGA (%)	>= 85%
B1.16.7	Local Inquiries w/Non-DistinctGA (%)	>= 85%
B1.16.8	Local Inquiries w/Non-DistinctGA (%)	>= 85%
B1.16.9	Local Inquiries w/Non-DistinctGA (%)	>= 85%
B1.16.10	Local Inquiries w/Non-DistinctGA (%)	>= 85%
B1.16.11	Local Inquiries w/Non-DistinctGA (%)	>= 85%
B1.16.12	ZV Analog Loop w/Non-DistinctGA (%)	>= 85%
B1.16.13	ZV Analog Loop w/Non-DistinctGA (%)	>= 85%
B1.16.14	ZV Analog Loop w/Non-DistinctGA (%)	>= 85%
B1.16.15	ZV Analog Loop w/Non-DistinctGA (%)	>= 85%
B1.16.16	ZV Analog Loop w/Non-DistinctGA (%)	>= 85%
B1.16.17	ZV Analog Loop w/Non-DistinctGA (%)	>= 85%

FOC & Fiber Response Completeness Multiple Responses - Mechanized

B1.17.1	B1.17.1	29.85%
B1.17.2	Switch Non-DistinctGA (%)	>= 85%
B1.17.3	Local Per ContaminationGA (%)	>= 85%
B1.17.4	Local Per ContaminationGA (%)	>= 85%
B1.17.5	Local Per ContaminationGA (%)	>= 85%
B1.17.6	Local Per ContaminationGA (%)	>= 85%
B1.17.7	Local Per ContaminationGA (%)	>= 85%
B1.17.8	Local Per ContaminationGA (%)	>= 85%
B1.17.9	Local Per ContaminationGA (%)	>= 85%
B1.17.10	Local Per ContaminationGA (%)	>= 85%
B1.17.11	ZV Analog Loop w/Non-DistinctGA (%)	>= 85%
B1.17.12	ZV Analog Loop w/Non-DistinctGA (%)	>= 85%
B1.17.13	ZV Analog Loop w/Non-DistinctGA (%)	>= 85%
B1.17.14	ZV Analog Loop w/Non-DistinctGA (%)	>= 85%
B1.17.15	ZV Analog Loop w/Non-DistinctGA (%)	>= 85%
B1.17.16	ZV Analog Loop w/Non-DistinctGA (%)	>= 85%
B1.17.17	ZV Analog Loop w/Non-DistinctGA (%)	>= 85%

FOC & Fiber Response Completeness Multiple Responses - Partially Mechanized

B1.18.1	B1.18.1	29.85%
B1.18.2	Switch Non-DistinctGA (%)	>= 85%
B1.18.3	Local Per ContaminationGA (%)	>= 85%
B1.18.4	Local Per ContaminationGA (%)	>= 85%
B1.18.5	Local Per ContaminationGA (%)	>= 85%
B1.18.6	Local Per ContaminationGA (%)	>= 85%
B1.18.7	Local Per ContaminationGA (%)	>= 85%
B1.18.8	Local Per ContaminationGA (%)	>= 85%
B1.18.9	Local Per ContaminationGA (%)	>= 85%
B1.18.10	Local Per ContaminationGA (%)	>= 85%
B1.18.11	ZV Analog Loop w/Non-DistinctGA (%)	>= 85%
B1.18.12	ZV Analog Loop w/Non-DistinctGA (%)	>= 85%
B1.18.13	ZV Analog Loop w/Non-DistinctGA (%)	>= 85%

Benchmark /
Analog

OST Measure	BST Volume	CLEC Measure	CLEC Volume	Standard Deviation	ZScore	Equity
		100.00%	3			YES
		100.00%	312			YES
		100.00%	240			YES
		100.00%	28			YES
		100.00%	3,045			YES
		100.00%	3,759			YES

		89.82%	152			YES
		81.93%	1,320			YES
		90.00%	30			NO
		100.00%	205			YES
		100.00%	53			YES
		90.00%	2,692			YES
		100.00%	28			YES
		89.81%	508			YES
		89.82%	417			YES
		97.13%	1,320			YES
		89.80%	594			YES

		100.00%	11			YES
		100.00%	18,419			YES
		83.23%	186			NO
		100.00%	3			YES
		100.00%	133			YES
		100.00%	29			YES
		100.00%	52			YES
		100.00%	33			YES
		100.00%	14			YES
		100.00%	15,419			YES
		100.00%	329			YES

		84.00%	25			NO
		82.04%	1,045			NO
		100.00%	3			YES
		84.74%	658			NO
		100.00%	3			YES
		100.00%	132			YES
		100.00%	340			YES

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Account	Measure	BST	BST Value	CLIC	CLIC Measure	CLIC Value	Standard Deviation	Standard Error	Equity
83.3.71	MAR.2 - Line Share (non-Deregulation) (%)	1.28%	\$4,422	0.05%	590	23,187	1,752	7,952	YES
83.3.72	MAR.2 - Line Share (Deregulation) (%)	0.22%	\$4,422	1.5%	595	3,862	0,010	1,147	YES
83.3.73	MAR.2 - Line Share (Deregulation) (%)	0.22%	\$4,422	1.2%	595	3,862	0,007	1,147	YES
83.3.82	MAR.2 - PVY Annual Long Non-Competition-Deregulation (%)	2.3%	4,015.59	17.2%	34,930	0,001	0,001	0,001	YES
83.3.91	MAR.2 - PVY Annual Long Non-Competition-Deregulation (%)	2.1%	4,015.59	0.7%	34,930	0,001	0,001	0,001	YES
83.3.92	MAR.2 - PVY Annual Long Non-Competition-Deregulation (%)	1.7%	4,015.59	0.9%	34,930	0,001	0,001	0,001	YES
83.3.102	MAR.2 - Other Non-Deregulation (%)	0.34%	3,558.06	0.9%	11,754	0,004	0,004	0,004	YES
83.2.11	MAR.2 - Other Non-Deregulation (%)	0.45%	689.09	2.8%	8,357	0,004	0,004	0,004	NO
83.2.112	MAR.2 - Other Non-Deregulation (%)	0.45%	689.09	1.4%	8,357	0,002	0,002	0,002	NO
83.2.12	MAR.2 - Line Share (Deregulation) (%)	1.44%	4,015.59	5.3%	2,910	0,023	0,023	0,023	NO
83.2.122	MAR.2 - Line Share (Deregulation) (%)	1.59%	3,558.06						

Market 4 - Long Distance

Account	Measure	BST	BST Value	CLIC	CLIC Measure	CLIC Value	Standard Deviation	Standard Error	Equity
83.3.11	MAR.3 - State Service-Deregulation (hours)	22.49	55,139			23,187			
83.3.12	MAR.3 - State Service-Deregulation (hours)	42.47	55,139			23,187			
83.3.21	MAR.3 - Local Inlandia Transpor-Deregulation (hours)	4.09	955	3.2%	1	3,862	0,640	0,214	YES
83.3.22	MAR.3 - Local Inlandia Transpor-Deregulation (hours)	2.37	668	3.4%	1	3,862	2,307	0,340	YES
83.3.32	MAR.3 - Local Inlandia Transpor-Deregulation (hours)	28.38	85,442	10.57	1,251	23,158	0,830	0,272	YES
83.3.33	MAR.3 - Local Inlandia Transpor-Deregulation (hours)	3.97	668	3.97	682	24,114	0,517	0,164	YES
83.3.41	MAR.3 - Other Non-Deregulation (hours)	21.98	87,763			24,114			
83.3.42	MAR.3 - Other Non-Deregulation (hours)	54.7%	1,933	5.4%	41	3,774	5,807	1,120	YES
83.3.52	MAR.3 - Other Non-Deregulation (hours)	24.27	505	4.7%	51	2,746	3,224	0,959	YES
83.3.62	MAR.3 - Other Non-Deregulation (hours)	22.59	546	4.5%	51	2,746	2,387	0,789	YES
83.3.72	MAR.3 - Line Share (Deregulation) (hours)	53.33	459	4.5%	1	0,429	1,800	0,380	YES
83.3.82	MAR.3 - Line Share (Deregulation) (hours)	49.72	1,053	7.3%	9	3,774	8,393	1,467	YES
83.3.91	MAR.3 - PVY Annual Long Design-Deregulation (hours)	22.38	85,442	7.0%	421	24,114	1,565	0,486	YES
83.3.92	MAR.3 - PVY Annual Long Design-Deregulation (hours)	22.38	85,442	3.4%	247	24,114	1,565	0,486	YES
83.3.93	MAR.3 - PVY Annual Long Design-Deregulation (hours)	22.38	85,442	13.4%	559	23,148	0,842	0,270	YES
83.3.94	MAR.3 - PVY Annual Long Design-Deregulation (hours)	7.89	2,321	4.9%	43	4,452	2,482	0,750	YES
83.3.101	MAR.3 - Other Design-Deregulation (hours)	2.55	3,319	4.97	104	27,481	2,387	0,750	YES
83.3.112	MAR.3 - Other Non-Deregulation (hours)	22.59	85,442	22.72	74	23,158	2,387	0,750	YES
83.3.122	MAR.3 - Line Share (Deregulation) (hours)	8.31	65,427	0.14	109	12,912	1,519	0,461	YES

7x Round Trunkline within 30 Days

Account	Measure	BST	BST Value	CLIC	CLIC Measure	CLIC Value	Standard Deviation	Standard Error	Equity
83.3.11	MAR.4 - State Service-Deregulation (%)	23.21%	81,138						
83.3.12	MAR.4 - State Service-Deregulation (%)	42.78%	86,267						
83.3.21	MAR.4 - Local Inlandia Transpor-Deregulation (%)	22.38%	668	100.00%	1	0,429	1,117	0,352	YES
83.3.22	MAR.4 - Local Inlandia Transpor-Deregulation (%)	22.38%	668	100.00%	1	0,429	1,117	0,352	YES
83.3.32	MAR.4 - Local Inlandia Transpor-Deregulation (%)	22.38%	85,442	15.48%	1237	0,212	0,602	0,188	YES
83.3.41	MAR.4 - Other Non-Deregulation (%)	20.95%	87,763	18.22%	842	0,015	1,303	0,410	YES
83.3.42	MAR.4 - Other Non-Deregulation (%)	23.78%	87,763						
83.3.52	MAR.4 - Other Non-Deregulation (%)	23.84%	1,033	31.81%	47	0,030	1,305	0,410	YES
83.3.62	MAR.4 - Other Non-Deregulation (%)	29.30%	505	8.2%	43	0,082	1,095	0,340	YES
83.3.72	MAR.4 - Line Share (Deregulation) (%)	32.05%	546	26.3%	31	0,056	0,728	0,226	YES
83.3.82	MAR.4 - Line Share (Deregulation) (%)	23.54%	1,033						
83.3.91	MAR.4 - PVY Annual Long Design-Deregulation (%)	23.33%	842	22.05%	91	0,102	1,183	0,363	YES
83.3.92	MAR.4 - PVY Annual Long Design-Deregulation (%)	23.36%	85,442	17.05%	247	0,076	2,384	0,740	YES
83.3.93	MAR.4 - PVY Annual Long Design-Deregulation (%)	23.36%	85,442	17.05%	599	0,076	2,384	0,740	YES
83.3.94	MAR.4 - PVY Annual Long Design-Deregulation (%)	23.36%	85,442	17.05%	247	0,076	2,384	0,740	YES
83.3.101	MAR.4 - Other Design-Deregulation (%)	38.41%	3,319	51.73%	104	0,084	1,381	0,420	YES
83.3.112	MAR.4 - Other Non-Deregulation (%)	23.36%	85,442	22.84%	71	0,052	0,761	0,233	YES

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Code	Description	Measure	BST Measure	BST Volume	CLEC Measure	CLEC Volume	Standard Deviation	Standard Error	ZScore	Equity
B 3.4.1.2	VARS.1 - Other Non-Dispatchable-Carrier (%)	20.55%	58,007	13.76%	169		0.03881	1.7122		YES
B 3.4.1.2	VARS.2 - LTR Standalone-Dispatchable (%)	28.47%	83,139							YES
B 3.4.1.2	VARS.3 - LTR Standalone-Dispatchable (%)	28.37%	58,427							YES
Out of Service > 24 hours										
B 3.5.1.1	VARS.5 - Single Point-Dispatchable (%)	28.87%	54,734	0.00%	1		0.04657	0.9457		YES
B 3.5.1.2	VARS.6 - Single Point-Dispatchable (%)	12.15%	14,320	0.00%	1		0.00650	13.4248		YES
B 3.5.1.2	VARS.7 - Single Point-Dispatchable (%)	0.21%	598	0.00%	1		0.01603	4.8971		YES
B 3.5.1.2	VARS.8 - Loop + Port-Dispatchable (%)	11.72%	58,318	0.00%	804		0.02189	1.4889		YES
B 3.5.1.2	VARS.9 - Loop + Port-Dispatchable (%)	27.56%	58,570	2.13%	47		0.00620	0.6547		YES
B 3.5.1.2	VARS.10 - Other Dispatchable (%)	10.00%	1	0.00%	58		0.04865	1.1922		YES
B 3.5.1.2	VARS.11 - Other Dispatchable (%)	34.61%	419	0.00%	31		0.05547	0.7466		YES
B 3.5.1.2	VARS.12 - LTR Standalone-Dispatchable (%)	1.91%	419	0.00%	31		0.02207	11.3947		YES
B 3.5.1.2	VARS.13 - LTR Standalone-Dispatchable (%)	100.00%	1	1.41%	247		0.02039	6.1842		YES
B 3.5.1.2	VARS.14 - LTR Standalone-Dispatchable (%)	28.46%	58,316	1.22%	489		0.05529	0.5146		YES
B 3.5.1.2	VARS.15 - LTR Standalone-Dispatchable (%)	28.88%	54,777	0.01%	216		0.07054	0.7142		YES
B 3.5.1.2	VARS.16 - LTR Standalone-Dispatchable (%)	5.25%	2,549	0.00%	104		0.05449	0.2486		YES
B 3.5.1.2	VARS.17 - LTR Standalone-Dispatchable (%)	0.99%	3,212	0.00%	49		0.05783	1.4889		YES
B 3.5.1.2	VARS.18 - LTR Standalone-Dispatchable (%)	29.46%	58,316	0.00%	31					YES
B 3.5.1.2	VARS.19 - LTR Standalone-Dispatchable (%)	28.87%	54,734							YES
B 3.5.1.2	VARS.20 - LTR Standalone-Dispatchable (%)	12.15%	14,320							YES
Unbundled Network Elements - Billing										
B 4.1	Invoice Accuracy	87.28%	\$388,051,310	89.95%	\$3,959,387		0.00069	-269,374		YES
B 4.2	Mean Time to Repair (Hours) - CRIS	3.05	1	3.3	1.24					YES
	Region (Business Units)									

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Georgia, May 2001

	Benchmarks / Analog		BST Measure		CLEC Measure		CLEC Volume		Standard Deviation		Standard Error		Z-Score		Equity	
	Measure	Volume	Measure	Volume	Measure	Volume	Measure	Volume	Measure	Volume	Measure	Volume	Measure	Volume	Measure	Volume
Maintenance Average Duration																
C.3.3.1	WARR-2 Local Interconnection Trunks/Interstate Trunks (WARR)	3	3.10	3	17.73	1	2.112	2.112	3.24748	-4.5083	NO					
C.3.3.2	WARR-3 Local Interconnection Trunks/Interstate Trunks (WARR)	221	0.11	0.29	99	2.433	2.433	0.28246	1.1924	YES						
C.3.4.1	3/4 Repeat Trunks within 20 Days	3	83.25%	3	0.02%	1			0.44243	0.7524	YES					
C.3.4.2	WARR-1 Local Interconnection Trunks/Interstate Trunks (WARR)	221	7.24%	221	49.22%	99			0.03124	-7.0586	NO					
C.3.5.1	Out of Service > 24 Hours	3	0.02%	3	0.06%	1			0.06060	0.3575	YES					
C.3.5.2	WARR-3 Local Interconnection Trunks/Interstate Trunks (WARR)	221	0.24%	221	0.00%	99			0.00912	0.3575	YES					
Local Interconnection Trunks - Billing																
Invoice Accuracy																
C.4.1	BST - GA (%)		97.22%	359,005	3.10	99.55%	\$4,286,972		0.00068	-368.3070	YES					
C.4.2	Mean Time to Deploy Invoiced CARRS		4.74	1	4.48	3,093					YES					
LOCAL INTERCONNECTION TRUNKS - TRUNK BLOCKING																
Trunk Group Performance - Aggregate																
C.5.1	Top-1 GA						0				YES					

>0.5% of 2 confic. hrs

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Operations Support Systems - Pre-Ordering		Benchmark / Anchor	BST Measure	BST Volume	CLEC Measure	CLEC Volume	Standard Deviation	Standard Error	ZScore	Equity
% Number Availability - CLEC										
0.111	OS2-2	REINTEGRATION (%)	34	69.5%	34	69.5%				YES
0.112	OS2-2	HAL-INTEGRATION (%)	34	69.5%	34	69.5%				YES
0.113	OS2-2	REINTEGRATION (RE)	34	69.5%	34	69.5%				YES
0.114	OS2-2	LEAD-INTEGRATION (%)	34	69.5%	34	69.5%				YES
0.115	OS2-2	LEAD-INTEGRATION (RE)	34	69.5%	34	69.5%				YES
0.116	OS2-2	LEAD-INTEGRATION (%)	34	69.5%	34	69.5%				YES
0.117	OS2-2	HAL-INTEGRATION (%)	34	69.5%	34	69.5%				YES
0.118	OS2-2	REINTEGRATION (%)	34	69.5%	34	69.5%				YES
% Number Availability - BST & CLEC										
0.121	OS2-2	REINTEGRATION (%)	34	69.5%	34	69.5%				YES
0.122	OS2-2	HAL-INTEGRATION (%)	34	69.5%	34	69.5%				YES
0.123	OS2-2	REINTEGRATION (RE)	34	69.5%	34	69.5%				YES
0.124	OS2-2	LEAD-INTEGRATION (%)	34	69.5%	34	69.5%				YES
0.125	OS2-2	LEAD-INTEGRATION (RE)	34	69.5%	34	69.5%				YES
0.126	OS2-2	HAL-INTEGRATION (%)	34	69.5%	34	69.5%				YES
0.127	OS2-2	REINTEGRATION (%)	34	69.5%	34	69.5%				YES
Average Response Interval - CLEC (LEAD) (BST Measure Anchor, Assessor 2 Scenario)										
0.131	OS2-1	REINTEG. BY INTRIGRAN (REASON)	RNS - RNSG BY TN + 2 Sec	2.77	1,482.246	1.33	404.417			YES
0.132	OS2-1	REINTEG. BY INTRIGRAN (REASON)	RNS - RNSG BY TN + 2 Sec	3.23	8,212	1.30	195.460			YES
0.133	OS2-1	REINTEG. BY ADDINTEG (REASON)	RNS - RNSG BY ADDIN + 2 Sec	2.91	3,094.673	1.30	195.460			YES
0.134	OS2-1	REINTEG. BY ADDINTEG (REASON)	RNS - RNSG BY ADDIN + 2 Sec	3.42	558.417	1.05	89.473			YES
0.135	OS2-1	REINTEG. BY ADDINTEG (REASON)	RNS - RNSG BY ADDIN + 2 Sec	2.68	299.954	1.05	69.473			YES
0.136	OS2-1	REINTEG. BY ADDINTEG (REASON)	RNS - OS2AP + 2 Sec	2.82	889.999	0.49	3.822			YES
0.137	OS2-1	REINTEG. BY ADDINTEG (REASON)	RNS - OS2AP + 2 Sec	3.69	2,006.532	1.24	302.255			YES
0.138	OS2-1	REINTEG. BY ADDINTEG (REASON)	RNS - CHSACTS + 2 Sec	3.17	497.165	12.61	41.525			NO
0.139	OS2-1	REINTEG. BY ADDINTEG (REASON)	RNS - CHSACTS + 2 Sec	2.96	993.490	0.74	47.672			YES
0.140	OS2-1	REINTEG. BY ADDINTEG (REASON)	RNS - CHSACTS + 2 Sec	2.38	641.438	0.74	47.672			YES
0.141	OS2-1	REINTEG. BY ADDINTEG (REASON)	RNS - CHSACTS + 2 Sec	4.39	641.719	0.16	118.977			YES
Average Response Interval - CLEC (TMA) (BST Measure Anchor, Assessor 2 Scenario)										
0.141	OS2-1	REINTEG. BY INTRIGRAN (REASON)	RNS - RNSG BY TN + 2 Sec	2.77	1,482.246	1.29	94.881			YES
0.142	OS2-1	REINTEG. BY INTRIGRAN (REASON)	RNS - RNSG BY TN + 2 Sec	3.23	8,212	1.29	94.881			YES
0.143	OS2-1	REINTEG. BY ADDINTEG (REASON)	RNS - RNSG BY ADDIN + 2 Sec	2.91	3,094.673	1.29	94.881			YES
0.144	OS2-1	REINTEG. BY ADDINTEG (REASON)	RNS - RNSG BY ADDIN + 2 Sec	3.42	558.417	1.07	54.864			YES
0.145	OS2-1	REINTEG. BY ADDINTEG (REASON)	RNS - RNSG BY ADDIN + 2 Sec	2.68	299.954	1.07	54.864			YES
0.146	OS2-1	REINTEG. BY ADDINTEG (REASON)	RNS - OS2AP + 2 Sec	2.82	889.999	0.49	3.822			YES
0.147	OS2-1	REINTEG. BY ADDINTEG (REASON)	RNS - OS2AP + 2 Sec	3.69	2,006.532	1.24	302.255			YES
0.148	OS2-1	REINTEG. BY ADDINTEG (REASON)	RNS - CHSACTS + 2 Sec	3.17	497.165	12.61	41.525			NO
0.149	OS2-1	REINTEG. BY ADDINTEG (REASON)	RNS - CHSACTS + 2 Sec	2.96	993.490	0.74	47.672			YES
0.150	OS2-1	REINTEG. BY ADDINTEG (REASON)	RNS - CHSACTS + 2 Sec	2.38	641.438	0.74	47.672			YES
0.151	OS2-1	REINTEG. BY ADDINTEG (REASON)	RNS - CHSACTS + 2 Sec	4.39	641.719	0.16	118.977			YES
Diagnostic										
0.152	OS2-1	REINTEG. BY ADDINTEG (REASON)	Diagnostic	3.47	386.477	1.06	19			YES
0.153	OS2-1	REINTEG. BY ADDINTEG (REASON)	Diagnostic	2.68	299.954	1.23	5.323			YES
0.154	OS2-1	REINTEG. BY ADDINTEG (REASON)	Diagnostic	2.82	889.999	1.88	47.493			YES
0.155	OS2-1	REINTEG. BY ADDINTEG (REASON)	Diagnostic	3.69	2,006.532	1.07	54.864			YES
0.156	OS2-1	REINTEG. BY ADDINTEG (REASON)	Diagnostic	4.66	2,568.84	0.70	17.003			YES
0.157	OS2-1	REINTEG. BY ADDINTEG (REASON)	Diagnostic	3.17	497.165	0.70	17.003			YES
0.158	OS2-1	REINTEG. BY ADDINTEG (REASON)	Diagnostic	3.98	2,298.124	1.17	3.728			YES
0.159	OS2-1	REINTEG. BY ADDINTEG (REASON)	Diagnostic	3.69	2,568.84	1.17	3.728			YES
0.160	OS2-1	REINTEG. BY ADDINTEG (REASON)	Diagnostic	3.17	497.165	1.17	3.728			YES

Operations Support Systems - Maintenance and Repair

BellSouth Monthly State Summary Georgia, May 2007

Collection - Collection	Benchmark/ Rating	BST		CLEC		Standard Deviation	Standard Error	ZScore	Equity
		Measure	Volume	Measure	Volume				
Average Response Time									
E-1.1.1 C-1 Virtual GA (calendar days)	< 20 days								
E-1.1.1 C-1 Physical GA (calendar days)	< 30 days								
Average Arrangement Time									
E-1.2.1 C-2 Virtual Arrangement GA (calendar days)	< 50 days								
E-1.2.2 C-2 Virtual Arrangement GA (calendar days)	< 60 days								
E-1.2.3 C-2 Physical Arrangement GA (calendar days)	< 60 days								
E-1.2.4 C-2 Physical Arrangement GA (calendar days)	< 60 days								
2 Day Dues Missed									
E-1.3.1 C-3 Physical (%)	< 5% missed			0.07%					YES
E-1.3.2 C-3 Physical (%)	< 2% missed				2%				YES

Bellsouth Monthly State Summary Georgia, May 2001

	Benchmark/ Analysis	BST Measure	BST Volume	CLIC Measure	CLIC Volume	Standard Deviation	Standard Error	ZScore	Equity
General - Flow Through									
F.1.1.1	% Flow Through Service Requests								
F.1.1.2	O-3 - Stormwater Service (%)	Diagnostic	86.65%	273,073	86.65%	273,073		Diagnostic	Diagnostic
F.1.1.3	O-3 - Residential Service (%)	Diagnostic	88.82%	278,073	88.82%	278,073		Diagnostic	Diagnostic
F.1.1.4	O-3 - Business/Religion (%)	Diagnostic	80.15%	22,514	80.15%	22,514		NO	NO
F.1.1.5	O-3 - Underreport (%)	Diagnostic	74.87%	4,341	82.55%	4,341		NO	NO
% Flow Through Service Requests - Achieved									
F.1.2.1	O-3 - Stormwater Service (%)	Diagnostic	78.44%	302,268	78.44%	302,268		Diagnostic	Diagnostic
F.1.2.2	O-3 - Residential Service (%)	Diagnostic	78.44%	302,268	78.44%	302,268		Diagnostic	Diagnostic
F.1.2.3	O-3 - Business/Religion (%)	Diagnostic	42.21%	20,728	42.21%	20,728		Diagnostic	Diagnostic
F.1.2.5	O-3 - Underreport (%)	Diagnostic	62.55%	3,371	62.55%	3,371		Diagnostic	Diagnostic
% Flow Through Service Requests - LMP									
F.1.3.1	O-3 - Stormwater Service (%)	Diagnostic	90.65%	1,802	90.65%	1,802		YES	YES
F.1.3.2	O-3 - Residential Service (%)	Diagnostic	90.65%	1,802	90.65%	1,802		YES	YES
F.1.3.3	O-3 - Business/Religion (%)	Diagnostic							
F.1.3.4	O-3 - Underreport (%)	Diagnostic							
General - Pre-Ordering									
Loop Makeup Inquiry (Manual)									
F.2.1.1	PO-1 - Loop-SA (%)	>= 95% w/in 3 bus days	100.00%	24	100.00%	24		YES	YES
F.2.2.1	PO-2 - Loop-SA (%)	>= 85% w/in 5 min	100.00%	819	100.00%	819		YES	YES
General - Ordering									
Service Inquiry with Firm Order									
F.3.1.1	O-T - MS, MASH, HCS, and UCL/USA (%)	>= 95% w/in 5 bus days	97.00%	292	100.00%	1		YES	YES
F.3.1.2	O-T - Local Inquiries (Temporary SA) (%)	>= 95% w/in 5 bus days							
General - Outdialing									
Average Speed of Answer									
F.4.1	F-T - (Sec/Sec) (%)	Partly w/ Retail	74.54	7,192,970	49.77	43,328		YES	YES
General - Maintenance Center									
Average Answer Time									
F.5.1	F-T - (Sec/Sec) (%)	Partly w/ Retail	65.59	1,683,272	28.70	27,420		YES	YES
General - Operator Services (Toll)									
Average Speed to Answer									
F.6.1	OS-1 - (Sec/Sec) (%)	PBD	2.35					PBD	PBD
F.6.2	OS-2 - (Sec/Sec) (%)	PBD	32.95%					PBD	PBD
General - Directory Assistance									
Average Speed to Answer									
F.7.1	DA-T - (Sec/Sec) (%)	PBD	5.80					PBD	PBD

Ballsouth Monthly State Summary Georgia, May 2007

Code	Description	Benchmark / Metric	BST Measure		CLEC Measure		Standard Deviation	Standard Error	ZScore	Equity
			Volume	Count	Volume	Count				
F.7.2	General - E311	PD0	83,205							PD0
F.8.1	Mean Interval	PD0			0.74	3.02				PD0
F.8.2	% Accuracy	PD0	95.97%	92,522						PD0
F.8.3	% Timeliness	PD0	100.00%	3,624						PD0
F.9.1	Usage Data Delivery Accuracy	Partly w/ Retail	100.00%	6,698	99.99%	-4.237	0.00000			NO
F.9.2	Usage Data Delivery Timeliness	Partly w/ Retail	97.46%	38,202	98.00%	18,784.707	0.00081	-7.8154		YES
F.9.3	Usage Data Delivery Completeness	Partly w/ Retail	99.04%	38,202	99.54%	18,784.707	0.00080	-9.5421		YES
F.9.4	Mean Time to Deliver Usage	Partly w/ Retail	3.74	38,202	3.76	18,784.707				NO
F.9.5.1	Recurring Change Completeness	Partly w/ Retail	77.49%	\$12,595,268	91.65%	\$433,830	0.01156	-1.05397		YES
F.9.5.2	Recurring Change Timeliness	>= 90%	90.37%	\$42,650						YES
F.9.5.3	Recurring Change Completeness	>= 90%	88.28%	\$12,199						YES
F.9.6.1	Non-Recurring Change Completeness	Partly w/ Retail	80.07%	\$15,025,557	94.49%	\$421,119	0.00108	-58.4485		YES
F.9.6.2	Non-Recurring Change Timeliness	>= 90%	90.55%	\$27,858						YES
F.9.6.3	Non-Recurring Change Completeness	>= 90%	90.55%	\$27,858						YES
F.10.1	General - Change Management									
F.10.1	% Software Release Notices Sent On Time	>= 95% w/ 30 days	79.00%	4						NO
F.10.2	Average Software Release Notice Delay Days	>= 22 has days prior to release	26	1						YES
F.10.3	% Change Management Documentation Sent On Time	>= 95% w/ 30 days	100.00%	5						YES
F.10.4	% Change Management Documentation (Defects, Corrections, etc.) Sent On Time	>= 95% w/ 30 days								YES
F.10.5	Average Documentation Release Delay Days	>= 22 has days prior to release								
F.10.6	% Change Management Outages Sent within 15 Minutes	>= 97% w/ 15 min	100.00%	33						YES
F.11.1	General - New Business Requests									
F.11.1	New Business Requests Processed within 30 Business Days	>= 90% w/ 30 bus days	100.00%	13						YES
F.11.2	% Change Management Requests Processed within X Business Days	>= 95% w/ 10 bus days								
F.11.2.1	BR-F20 (Request %)	>= 95% w/ 10 bus days	89.71%	3						YES
F.11.2.2	BR-F21 (Request %)	>= 95% w/ 10 bus days	7.60%	13						NO
F.11.2.3	BR-F22 (Request %)	>= 95% w/ 10 bus days								

BellSouth Monthly State Summary Georgia, May 2001

General - Ordering		Benchmark/ Rating	BST Measure	BST Volume	CLEC Measure	CLEC Volume	Standard Deviation	Standard Error	Zscore	Equity
Acknowledgment Message Timeliness										
C-1	EDIRRegion (%)		>= 90% w/n 30 min		81.62%	59,463				NO
F-13.1.1										
C-1	ACRegion (%)		>= 95% w/n 30 min		81.92%	19,306				YES
F-13.1.2										
F-13.2.1										
F-13.2.2										
F-13.2.3										
F-13.3										
General - Database Updates										
Account Database Update Interval										
D-1	EDIRCA (Hours)	PBD		26	656	26				PBD
F-13.1.1										
D-1	EDIRCA (Hours)	PBD		27	111	27				PBD
F-13.1.2										
D-1	Directory Assumptions (Hours)	PBD		26	452	26				PBD
F-13.1.3										
% Update Accuracy										
D-2	EDIRRegion (%)		>= 95%		100.00%	119				YES
F-13.2.1										
D-2	EDIRRegion (%)		>= 95%		100.00%	92				YES
F-13.2.2										
D-2	Directory Assumptions (%)		>= 95%		100.00%	92				YES
F-13.2.3										
D-2	Directory Assumptions (%)		>= 95%		100.00%	92				YES
F-13.2.3										
% XXXX / LHM Loaded by JERG Effective Date										
C-3	US (%)		100%		84.65%	33				NO
F-13.3										
General - Network Outage Notification										
Mean Time to Notify CLEC of Major Network Outage										
C-3	US (minutes)	Party w/ Reach								
F-14.1										

July 10, 2001

DELIVERED BY HAND

Mr. Reece McAlister
Executive Secretary
Georgia Public Service Commission
244 Washington Street, S.W.
Atlanta, Georgia 30334-5701

Re: *Performance Measurements for Telecommunications Interconnection,
Unbundling and Resale*; Docket No. 7892-U

Dear Mr. McAlister:

Enclosed herein please find the original and eighteen (18) copies, as well as an electronic version, of BellSouth Telecommunications, Inc.'s ("BellSouth") revised Monthly State Summary Report for May 2001 and an overview of the revisions that have been made. After the May 2001 Monthly State Summary Report was originally filed, BellSouth discovered errors in the calculations associated with the production of Average Completion Notice Interval and Reject and Firm Order Confirmation Completeness measures. The original report also included several clerical errors and failed to reflect certain performance data related to ISDN loops, Jeopardies, and BellSouth's retail ADSL. All of these errors have been corrected, and the new results are incorporated into the revised Monthly State Summary Report. The specific revisions, including the results as originally filed for May 2001 as well as the new results, are shaded in yellow in the attached overview.

The revised Monthly State Summary for May 2001 was posted on BellSouth's Performance Measurement and Analysis Platform ("PMAP") on July 9, 2001. In addition, copies of the revised Monthly State Summary Report and the overview of the revisions are being distributed electronically today to all parties of record. I would appreciate your filing these documents in the above-referenced docket and returning the three (3) extra copies stamped "filed" in the enclosed self-addressed and stamped envelopes.

Mr. Reece McAlister
July 10, 2001
Page Two

Thank you for your assistance in this regard.

Yours very truly,

Bennett L. Ross

BLR:nvd
Enclosures

cc: Parties of Record (via electronic mail)

399267

KC Timmons
Manager Supplier Performance Measurements
Local Services – Southern Region

Room 12227
Promenade I
1200 Peachtree St. NE
Atlanta, GA 30309
404 810-3914

August 2, 2001

Jan Flint
BellSouth Interconnection Services
1960 West Exchange Place, Suite 200
Tucker, Georgia 30084

Dear Jan:

The purpose of this letter is to make BellSouth aware of potential data integrity issues around the Firm Order Confirmation and Reject Response Completeness, Firm Order Confirmation Timeliness, and Reject Interval reports in PMAP.

The Firm Order Confirmation and Reject Response Completeness report in PMAP is intended to summarize the corresponding number of Local Service Requests (LSR's) received to the combination of Firm Order Confirmation (FOC) and Reject Responses for a given month. The raw data for the FOC and Reject Response Completeness report details all of the LSR's received in the report period and indicates the number of FOC's or Reject Responses per LSR version. The FOC Timeliness and Reject Interval raw data files from PMAP contain detail of all of the LSR's that were either FOC'd or respectively rejected during a reporting period.

Understanding the intentions of these three measures would lead me to believe that the LSR's listed in the FOC and Reject raw data would be a sub-set of the LSR's contained in the FOC and Reject Response Completeness raw data. However, after an analysis of Operating Company Number (OCN) 8392 raw data for May 2001, I have serious data integrity concerns with the three raw data reports.

The FOC and Reject Response Completeness raw data file contains 721 records while the FOC and Reject raw data files together include 672 records. Of the 672 records in the combined FOC and Reject raw data file (see Attachment 1), only 590 have matching LSR's in the FOC and Reject Response Completeness file. 42 of those 590 records are duplicate LSR's. This translates into 548 distinct LSR's from the FOC and Reject raw data files that are also included in the FOC and Reject Response Completeness raw data. Why are there 82 LSR's in the combined FOC and Reject raw data that are not included in the FOC and Reject Response Completeness raw data?

Additionally, there are 173 LSR's in the FOC and Reject Response Completeness raw data file that do not exist in the FOC and Reject Raw Data files (see Attachment 2). It is expected that if a submitted LSR shows a "0" in the "RESP_CNT" field from the completeness raw data, then that LSR would not appear in the combined FOC and Reject raw data file since no response was received for that submitted LSR. However,

121 LSR's that contain a "1" in the "RESP_CNT" field were missing from the combined FOC and Reject raw data file. If the 121 LSR's did receive either a FOC or a Reject from BellSouth, why are they not included in the FOC and Reject raw data files? Likewise, there are 4 LSR's that contain a "0" in the "RESP_CNT" field in the completeness raw data that are present in the combined FOC and Reject raw data file. If the 4 LSR's did receive either a FOC or Reject, why is there a "0" in the "RESP_CNT" field?

These issues do point to potential data integrity concerns in PMAP. Please provide a response to this issue by August 17, 2001. I would be more than willing to meet with BellSouth in an effort to clarify any assumptions made in this data analysis. Call me if you have any questions or concerns. I can be reached at 404-810-3914. I can be paged at 1-888-858-7243, pin number 115394.

Sincerely,

KC Timmons

Copy to: Denise Berger

Attachment

KC Timmons
Manager Supplier Performance Measurements
Local Services – Southern Region

Room 12227
Promenade I
1200 Peachtree St. NE
Atlanta, GA 30309
404 810-3914

July 16, 2001

Jan Flint
BellSouth Interconnection Services
1960 West Exchange Place, Suite 200
Tucker, Georgia 30084

Dear Jan:

The purpose of this letter is to ascertain why discrepancies exist between PMAP raw data and AT&T-generated Purchase Order Number (PON) specific data. Specifically, in May AT&T received confirmation on a significant number of Local Number Portability (LNP) PON's that do not appear in the May PMAP LNP raw data.

Attached are two lists of AT&T-generated LNP PON's that received a Firm Order Confirmation (FOC) during May 2001. Attachment 1 lists PON's for Operating Company Number (OCN) 7125 and Attachment 2 represents OCN 7421 PON's. I have compared these two lists to the May Ordering: LNP FOC Timeliness Intvl Distribution & FOC Avg Intvl raw data files for OCN's 7125 and 7421 respectively. None of the 406 PON's in these attachments are present in the PMAP LNP raw data. Why are the BellSouth-generated raw data files missing so many AT&T PON's that were FOC'd in May?

Before May 2001, BellSouth-generated LNP raw data was not available to the CLEC community. Now, there are significant data integrity concerns with the LNP raw data being provided in PMAP. The resolution of this discovery is a high priority for AT&T. Please provide a response to this issue by July 30, 2001. I would be more than willing to meet with BellSouth in an effort to reconcile the AT&T-generated data with the BellSouth-generated raw data. Call me if you have any questions or concerns. I can be reached at 404-810-3914. I can be paged at 1-888-858-7243, pin number 115394.

Sincerely,

KC Timmons

Copy to: Denise Berger

Attachment



BellSouth Interconnection Services
1960 West Exchange Place
Suite 200
Tucker, GA 30084

AT&T Regional Account Team
770-482-7550
Fax 770-482-9412

Suppl. Rebuttal Testimony of Sharon
Norris
KY Docket No. 2001-105
Exhibit SEN-9

August 8, 2001

Mr. K. C. Timmons
AT&T
Room 12227, Promenade I
1200 Peachtree Street, N.E.
Atlanta, GA 30309

Dear K.C.:

This is in response to your July 16, 2001 letter requesting an explanation for AT&T's Local Number Portability (LNP) Purchase Order Numbers (PON) submitted in May 2001 for Operating Company Numbers (OCN), 7125 and 7421 not appearing in the May 2001 Performance Measurement Analysis Platform (PMAP) raw data.

BellSouth appreciates AT&T bringing these discrepancies to BellSouth's attention. BellSouth's preliminary investigation confirms that the PONs provided with your letter are missing from the LNP raw data files. At this time, BellSouth is unable to determine the cause of the PONs not appearing in the LNP raw data. The discrepancies that AT&T identified in its July 16, 2001 letter have been referred to the appropriate BellSouth analysts for resolution. As soon as BellSouth can determine the solution that will allow the data to appear in the raw data files and the date that the data will be available to AT&T, I will let you know.

In the meantime, if we need to discuss this issue further, prior to the data being made available, please call me at 770 492-7575.

Sincerely,

A handwritten signature in cursive script that reads "Jan Flint".

Jan Flint

Cc: Denise Berger
Jan Burriss
Phillip Porter